

The Shire of York
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SHIRE OF YORK	
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OFFICER	INITIALS
KIRA	
25 MAY 2015	
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REFERRED TO COUNCIL	
DATE	INITIALS

To The York Shire and Councilors,

Re: Landfill Proposal by SITA on Allawuna Farm – Lots 9926, 4869, 5931 and 26934
Great Southern Highway, St. Ronan's, York.

I absolutely oppose the above named landfill (rubbish dump) proceeding for a number of reasons.

In the SAT summary of reasons for the decision on the 10th April to approve the amendment, Senior Member Peter McNab is quoted:

- “And, of course the proposed use does not change.”
- And also: “the conclusion is that the essence of the proposal remains unchanged.”

As nothing has substantially changed, then all the submissions against the original application are still valid. The SoY Planning Officer's report is still valid, the reasons for Council voting unanimously against the proposal are still valid and the JDAP's reasons for upholding the Council's decision and refusing the application are still valid.

The amended application has reduced the scale of the tip and now demands the on-site extraction of 1.4 million tonnes of capping material. Reducing the tip life to 20 years is disingenuous as SITA declines to rule out lodging further applications, which will follow in due course. SITA's 30% market share of the waste industry will top one million tonnes per annum within 10 years, and is destined for trucking to Allawuna. The continuing demand for capping material will also see the on-site extraction expand over Allawuna in unison with the growth of Perth.

It's interesting that SITA is now promoting fewer truck movements because of the on-site extraction – the affected area at Allawuna being as large as 21 MCGs, one of the solicitors described at a recent hearing. These truck movements were never even mentioned previously, as SITA originally promoted 'only' 3 rubbish trucks (road trains) per hour carrying rubbish to the farm site. They failed to even mention the traffic created by those rubbish trucks returning to collect more of the same. This is just one example of SITA's attempt to present a rosy picture of their highly noxious industry and its damaging impact on every aspect of the environment and the lives of those directly and indirectly affected by it.

With such a large area being affected on Allawuna Farm by onsite extraction of capping material, the essence of York's Town Planning Scheme – namely, the 16 points from the RAR on which the previous proposal was refused – is even more in jeopardy. This will no doubt expand as time progresses and the tip covers larger and larger sections of Allawuna Farm in line with the expansion of Perth's growing rubbish. This is exactly what has been happening at SITA's rubbish tip in Cardup: an area SITA promised the locals would be left for the native wildlife has been taken over and filled with rubbish. If SITA had more land area there, no doubt they would continue to expand. Thus the destiny of Allawuna Farm is to be entirely filled with rubbish or some other aspect of SITA's noxious industries.

Another point to note is the disclaimer by the engineering company recently employed by SITA in an apparent attempt to assure the sceptical public that all is perfectly in order re safeguarding the purity of our drinking water, which is very likely to be seriously polluted by a rubbish tip so near water catchment areas. Golder's disclaimer states: “.... Given the

limited nature of the enquiry, Golder was retained to undertake with respect to the site"... "Golder did not perform a full assessment of all possible conditions or circumstances that may exist at the site...." Therefore, this well-recognized engineering company lends no credence to the safety of our water supply, in spite of SITA's manipulations of the truth.

Contamination of Food and Water Sources

First and foremost, there are far better places than prime farm land situated in water catchment areas because contamination is inevitable, based on the realities of every existing landfill on the planet. Re water catchment: the truth is the water flow begins above the nominated site and SITA plan to divert the water uphill – an unimaginable suggestion when the flow will be a torrent and uncontrollable during York's typical summer storms and during our rainy seasons. Why would anyone – government in particular – wish to putrify its food supply and clean water sources? Other countries would envy what we so take for granted and are prepared to callously destroy. Animals, obviously more sensible than some humans, know better than to contaminate their food and water sources...

The numerous signs all around the 'Welcome to York' sign attest to the protection afforded the water catchment area surrounding Allawuna Farm. These signs seem to have been overlooked by SITA when evaluating the viability of choosing Allawuna Farm as ideal for a noxious landfill.

Minister Jacob also advised the Avon Valley Residents Association Inc that there are other landfills, existing and proposed, that could meet the needs of the metropolitan area for the next 10 to 15 years. This proposal by SITA could institute an oversupply of landfill space, a blot on the landscape of Mother Earth, for no reason at all. It is extremely unjust that the by-product of waste streams generated by commerce, industry and private enterprise, mainly located in the Metropolitan area and from which profit and income is derived, should have the potential to become the liability of the Shire of York and most likely the death knell for this beautiful getaway destination.

More Viable Alternative Locations **Viable Rail Alternative**

Secondly, many York residents have suggested sending Perth's rubbish by rail to areas where the land is already degraded and the waterways do not feed directly into our drinking water. Landfills, without exception, leach highly toxic chemicals into the land / surrounding waterways. Transporting rubbish by rail would safeguard the highways, as well as the country road leading to York (known as Gt Southern Highway). It follows that fuel would be saved and pollution caused by fuel emissions from relentless roadtrain, truck and vehicle movements associated with a tip site would be much less, thanks to the efficiency of rail transport.

The rail system can carry landfill waste / contaminants to areas outside of the food and water bowl of Perth (ie, the Avon Valley in which York plays an important role as supplier of both food and water for Perth and surrounds). Therefore, contamination – which is inevitable, based on the reality of putrescible waste (rather than on the Proponents' glossy projections) – will be at a distance to safeguard food and water supplies. Furthermore, the rail companies are eager for the business, have locomotives and carriages at-the-ready, and can build the necessary infrastructure to connect with the transfer stations within a maximum of 2 years, even as little as 1 year.

In addition, far less fuel will be consumed, a significant issue in the current growing awareness of pollution issues as well as supply shortages which are leading to ever-increasing costs of fuel.

Add to these factors the removal of road hazards generated by continuous road trains, especially along Gt Southern Highway, which is not constructed to cater for them safely.

Big Business Deceit and Exploitation

Thirdly, SITA's proposal is filled with lies, half-truths and omissions of what is actually the present situation at Allawuna Farm, as well as the consequences concerning their proposed rubbish dump. As you read on, you will be given some details about their deceit. A large number of submissions already presented to the EPA and to the Appeals Convenor have pointed these out, yet the EPA rubber stamped everything SITA wrote as actual fact rather than cross referencing all the information proving otherwise. The Appeals Convenor did precisely the same, with Minister Jacob signing us off.

Lack of Community Consultation and Forward Planning

Fourth, from the FOI application I submitted and the documents I have received to- date (many are still missing), there is clear evidence that SITA, in conjunction with the Shire of York, attempted to push through their proposal before York residents had a chance to even find out about it, moretheless unite and address the proposal. The impact on individual / family lives, farms (especially those adjacent to and surrounding Allawuna Farm), the continued certification of an organic farm 2 km away, road safety (Gt Southern Hwy is our main artery and most direct route to and from Perth and surrounds), businesses in an historic tourist / visitors' town which relies on easy access to York, and the current town planning scheme (which does not include noxious industry on farmland) is abhorrent. And what about the legacy being destroyed for future residents of York: our children, grandchildren, and beyond?

In fact, when a resident found out about the planned tip approximately 10 days before the residents were meant to be even told about the SITA presentation on 17 November 2012 (scheduled by our Shire at 2 pm on a Monday – how utterly inconvenient for those residents who work and/or have children to collect from school at that time...), he rang SITA. The spontaneous response on the phone was "So the cat is out of the bag!". Interesting comment, which tells much about what had been going on behind the scenes between SITA and the Shire of York. By that time, SITA already had its proposal rubber stamped by all the departments and, by SITA's admission, was at least 20% along the way to acceptance of it. From the documents released by my FOI application, the Shire and SITA were expecting to have the site approved by the EPA by the end of 2012, and the rubbish dump being established in 2013. Fortunately for the residents of York, our efforts have at least stalled their confident march forward and given us a ray of hope that common sense – not greed and collusion – will prevail.

Among the many lies in SITA's proposal is their description of Community Consultation. They never had the integrity to contact the residents living adjacent to the site – nor did our Shire – and SITA has not followed through on establishing other consultative bodies (one of which I had expressed interest in joining). They know full well that the report back from any members would have belied their rhetoric. It is most unfortunate that SITA's communications about the proposed dump read / are heard as *fait accompli*, a done deal – something that was made possible by the support of York's CEO, the planning officer and Shire Councillors throughout 2012.

Size of the Rubbish Tip Site

Fifth, it's interesting that, although the original proposal put forth by SITA included less than 10% of the 1500 hectare Allawuna Farm for the rubbish tip (the remainder would continue to be farmed, they initially declared), they nonetheless have filed all four lots as part of their current proposal. Does not this suggest something more ominous than a 'modest' 40 year rubbish tip is really on their cards? It is well known that once a rubbish tip is approved, there is no way to hold a large (in this case, multinational) company to its 'promises'. Just ask the residents at their Cardup site what happened to the land surrounding the original section of that landfill in spite of promises it would not be touched.

Now for some details about SITA's statements vs the truth:

CHEMICAL STORAGE DISCHARGE TO LAND AND WATER SOLID & LIQUID WASTE MANAGEMENT

Q: What sort of waste is going into the landfill?

SITA's Answer:

- Waste from residential wheelie bins, stores, restaurants and workshops will be accepted at the landfill.
- Asbestos that is wrapped up will be safely buried deep in the landfill.
- Nothing hazardous or toxic will be taken to the site. No radioactive or liquid waste will be accepted.

What SITA is not telling us:

Hazardous Waste

In their document, SITA state right from the outset, that the landfill facility is going to be a benign entity that only accepts "Waste from residential wheelie bins, stores, restaurants and workshops."

This supposedly harmless waste material will also contain so called 'E-waste' or discarded electronic items such as old mobile phones, TVs and computers. E-waste contains many toxic substances including lead, cadmium, barium, mercury, chromium, and polychlorinated biphenyls. All these are highly toxic and dangerous to human health and the environment and there is no legislative framework to deal with these items.

Yet SITA say "Nothing hazardous or toxic will be taken to the site".

Furthermore, there is nothing to prevent SITA from asking for an extension of their operational licence to handle radioactive waste, toxic liquid waste and medical waste later in the site's initial 40 year period of operation. SITA have given no assurance in their material that they will not do this.

Q: How do you protect the surrounding environment?

SITA's Answer: The landfill is lined with a layer of plastic and clay on the bottom, and then covered with a cap on top as it fills. All of the water from the waste is captured and treated so that it doesn't harm the surrounding environment

Q: How do you make sure it doesn't leak?

SITA's Answer: Installing the liner involves a thorough leak testing program, verified by an independent third party observer.

What SITA is not telling us:

Too Dangerous for Perth

The Environmental Protection Authority of WA (EPA) has decided that landfill sites are too dangerous to be situated on the Swan Coastal Plain and therefore, need to be relocated to rural areas.

If the EPA and DEC lack faith in their cell containment designs for the metropolitan area, why then is it deemed suitable for the Avon Valley?

Spills and Leakage

Any safety precautions at the site are subject to human error. This is normal and frequent in all walks of life. When problems arise in such naturally pristine locations, their repercussions are generally not rectifiable. SITA's own web site is littered with examples of human error and contravention of its own rules, resulting in spillages and accidents. This highlights the fact that the selection of the most suitable site should always be the highest priority on the proponent's agenda.

All these tips leak and overflow. They only differ in the degree of non-compliance. The desire to relocate to the proposed site near York, suggests that SITA is unable to fulfil approval conditions on the Swan Coastal Plain.

SITA promotes itself as a leader in the field of waste management in Australia. In reality, Australia has some of the world's most lax standards regarding waste management. We continue to dig holes, but sealing them is proving to be beyond us. As SITA is clearly not under pressure to conform to the highest possible standards in the field of waste management, it must be concluded that they may simply be interested in the maximisation of profit at the expense of the concerns of local communities and the environment.

SITA also state that all waste trucks entering the landfill will be weighed and inspected to ensure they meet the waste acceptance criteria. Any vehicle with non conforming waste such as liquid waste, unacceptable industrial waste or radioactive waste will be directed to use an alternative facility.

How can they inspect the entire contents of the road trains – massive 70 foot vehicles - to ensure there is no non-conforming waste buried somewhere in the metres deep rubbish?

Q: How do you protect the surrounding environment?

SITA's Answer: The landfill is lined with a layer of plastic and clay on the bottom, and then covered with a cap on top as it fills. All of the water from the waste is captured and treated so that it doesn't harm the surrounding environment.

The landfill is sited adjacent to a small seasonally dry creek that contributes to Thirteen Mile Brook. Runoff from this small upstream catchment will be directed into a stormwater dam for onsite use.

What SITA is not telling us:

Water Catchment

The proposed landfill facility is likely to cause the following hydrological impacts, resulting in a significant impact on the environment.

- Engineering works to manage stormwater flows on site will result in changes to flows and volumes downstream including likely impacts on ecological water requirements,
- the tributaries on adjacent farms will not be flushed and salinity will result,
- salinity in the upper reaches (the Talbot area) of the catchment will be increased,
- the massive revegetation projects in the catchment (over 400,000 trees & plants) in a cooperative venture with the Talbot Brook Land Management Assoc Inc, Department of Water, Swan River Trust, Lottery West will be endangered,
- heavy vehicles will be forced to cross 13 Mile Brook, with possible changes in flow paths and volumes from the construction of bridges and the danger of gas emissions and spillages,
- natural drainage and seepage lines will be changed by construction on the site,
- climate change experts predict extreme weather events in the future. Summer storms produce massive flows in these seasonal watercourses. Local flooding and overflows from the site are a distinct possibility. There have been several such incidents in recent years.
- the toxic dust from the site will be transferred via 13 Mile Brook into the Avon-Swan Catchment.

- **SOLID & LIQUID WASTE MANAGEMENT
CHEMICAL STORAGE
DISCHARGE TO LAND AND WATER
AIR EMISSIONS
DUST EMISSIONS**

SETTING: Tour of Allawuna Farm, Friday morning, 15 February, 2012

HOSTED BY: Nial Stock, SITA's state manager, and Peter Bowman, SITA's consulting engineer

TOPIC: Leachate, the liquid that leaks out of landfills

At the leachate ponds, a lively debate took place about the management of leachate, the liquid that leaches out of the landfill and needs to be captured and contained. The proposed ponds are

about 1.6 meters deep and will dry out in summer. According to Mr Stock, this is normal practice and the residue will be collected and put back into landfill.

Mr Stock was not in the least concerned about the toxicity of the leachate and described it as a 'fertilizer' like substance. When some of those on the tour repeatedly expressed disagreement, Mr Bowman reminded Mr Stock that leachate did contain traces of heavy metals. Mr Stock was asked about dry leachate ponds being exposed to the wind and the residue being blown around the country side. He did not see it was a problem.

What SITA is not telling us:

Leachate is any liquid that, in passing through matter, extracts solutes, suspended solids or any other component of the material through which it has passed. It is most commonly used in the context of land-filling of putrescible or industrial waste. Leachate contains significantly elevated concentrations of undesirable material derived from the material that it has passed through. (*Ref. Wikipedia, the free online encyclopedia*)

Organic wastes represent more than a third of all waste that is disposed to landfills. Organic wastes consist of all solid food and food processing wastes, paper wastes, green waste, wood waste, timber processing wastes, biosolids, manures, and sludges. Due to the volume of organic waste and its qualities, environmental issues arise from landfills, one being the resulting leachate.

Then add **E-waste** to the landfills. a pot-pourri of different chemicals that go into making electronics, which create a very toxic problem because they leach into our soil and groundwater as the products degrade. These chemicals include lead, brominated flame retardants, antimony oxide, cadmium and beryllium.

And there's more: 98 per cent of all **fluorescent lights** are crushed into landfill and this adds up to a lot of **mercury**. It's safe to say that fluorescent lights are the most significant source of mercury contamination of all the waste we produce.

Furthermore, the following **chemicals** are listed by the EPA as being present in landfills: Aluminium, barium, boron, cobalt, copper, manganese, vanadium, zinc, arsenic, beryllium, cadmium, chromium, lead, mercury, molybdenum, nickel, selenium, silver, cyanide, fluoride, benzene, cresols, ethylbenzene petroleum hydrocarbons, phenol, polycyclic aromatic hydrocarbons, styrene (vinyl benzene), toluene, xylenes, chlorinated organics⁵, organochlorine pesticides, polychlorinated biphenyls etc.

Indemnification and Common Law Rights

Can the Shire of York guarantee that SITA will have a properly administered and substantial fund set aside sufficient for 40 years of leachate treatment, borehole water testing, gas monitoring, methane testing and dispersal, flare or gas engine maintenance, emergency response to fires and general site maintenance?

What SITA is not telling us:

A major deficiency in the documentation provided by the applicant for the proposed landfill application regards the extent of manpower and funding that will be available for the monitoring of the landfill for the minimum of 40 years that the landfill remains biologically active after the last delivery of waste. During this period, the landfill will continue to produce leachate, methane and have the potential for explosions and fires.

The EMRC landfill at Red Hill has set aside \$10 million for emergency and remediation. An engineer speaking at a meeting in Toodyay (June 2013) expressed concern that a multinational company such as SITA had not made it known what indemnification fund will be available.

Based on the principles of ‘**common law**’ the residents of west York have ‘the right to the enjoyment of their properties and their amenities.’ These amenities include any changes in our air and water quality, noise, odour, pollution and the altered value of our land. All these are in jeopardy because of this proposed landfill.

None of the reports touch upon the matter of indemnifying the community in case of either pollution of the ground water, drinking water, livestock or pasture. This western area of the wheat belt still maintains a high rainfall and very successful cropping regime. Grain crops are grown on Allawuna right at the site of the proposed development and completely surrounding it. Who monitors any contamination of these crops? If the EPA approves this development, are they the body responsible, or is it the local council? Who pays for any clean up?

No mention is made in any of the proposal documents of process of indemnifying the community against the cost of any major clean up. Historical data, from other landfill disasters, show the cost of clean ups to run into the tens of millions of dollars. Who pays? Who indemnifies the community from any adverse outcome? It is insufficient to assure ourselves that the proponents will, as history says otherwise.

- The EMRC Red Hill landfill site currently has a cell leak. Red Hill is in a seismically more stable area and was built above international and Australia standards.
- Recently the Stevenson Rd landfill in Cranbourne Vic (licensed in 1996) had a methane gas leak (unlined pit) which is costing the Vic Govt. \$24 million in rehabilitation
<http://www.benglobal.com/storyview.asp?storyID=9587804§ion=General+News§ionsourc=s1450127>
- In America in 1999 groundwater contamination from a landfill cost \$23 million in cleanup fees <http://www.waste-management-world.com/articles/print/volume-8/issue-2/features/landscapes-of-risk.html>

Fauna

What SITA is telling us about native plants and animals:

A field survey of the complete works area has been performed looking for rare or endangered plants and animals. As the landfill is being constructed on already cleared cropland, unsurprisingly, no rare or significant plants were found. A few scattered remnant Gums, Wandoo and Marri trees on the site were carefully inspected for evidence of Black Cockatoo roosting or breeding and found to be all clear.

What SITA is not telling us about Fauna:

Establishment of the site will require the clearing of native vegetation that is considered to provide habitat for protected fauna, namely Carnaby's Cockatoo. A bird list for the area surrounding the landfill site is extensive and includes other rare species: Red-tailed Cockatoo, Baudin's Black- Cockatoo, Western Yellow Robin, Black Shouldered Kite and Wedge-tailed Eagle.

The wedge tailed eagle (*Aquila audax*) is found in the Wandoo National Park which borders the property selected by SITA and has been observed on Allawuna farm. It has a generalised diet and preys on animals according to their relative abundance and also eats carrion. This means that rats from the landfill and rotting meat in the waste could potentially be eaten and this would affect the local population and introduce disease and poisons into the wild animals that inhabit the park. As a native species, the wedge-tailed eagle is protected under the provisions of the Wildlife Conservation Act 1950).

The Helena River, which is fed by the Mundaring and Helena catchment, also has a few remaining native fish which are endemic to this system, and any contamination will significantly threaten their habitat and species viability.

A large flock of the rare Carnaby's Cockatoo uses this farm and adjacent areas. The cockatoos require a close association between breeding and feeding sites. They have been observed on many of the farms in the areas, feeding on marri seeds and crops. Residents, who have gone to the fences of Allawuna farm boundaries, from October onwards, have observed a flock of between 40 and 50 birds in the trees and on the grounds of the farm.

The subject property, "Allawuna", has so far been denied the right to clear land – primarily because of the property's location being at the foot of Mount Observation in close proximity to important drinking water catchments and also because of the presence of the Carnaby's Black-Cockatoo and the relevant legislation which covers this Australian Threatened Species.

It is also noteworthy that a landowner, who shares a boundary with Allawuna farm, was denied subdivision of his property because of the flora and fauna concerns, especially the disturbance to the habitat of the Carnaby's Cockatoo.

This proposal also will have major ramifications for bio-security in the area as feral animals will be attracted to the site to scavenge amongst the rubbish, which includes waste from hospitals and restaurants as indicated by SITA. Feral pigs and cats, wild dogs, mosquitoes, seagulls and introduced species of birds pose a significant threat to native fauna and will be a major nuisance to this area, creating greater problems for the fragile environment and the community including damage to fences, destruction of stock, contamination of water sources (both for human and stock consumption) and impacting on crops.

There is a very real threat that this may result in the transmission of Salmonellosis, a bacterial disease which affects both humans and a wide range of animals, including cattle, sheep, horses, chickens, fish and birds across the region. Cattle can be chronically infected after drinking contaminated water or digesting contaminated food on which a carrier bird has landed. One affected cow can serve as a carrier within the herd without exhibiting clinical signs. Salmonellosis is currently having a serious economic impact on the cattle industry worldwide. The possibility of the Carnaby's Black-Cockatoos falling victim to Salmonella whilst scavenging at the "Allawuna" tip is also a very real threat to this already threatened species.

There are a large number of trees on the site that will need to be cleared for the landfill. This is where the Carnaby's Black Cockatoos regularly feed. There is a forest near the site where the wedge tailed eagle nests.

SITA claims, in its proposal, that Allawuna farm is fauna free.

What SITA is not telling us:

A close examination of the western and southern boundary fences of Allawuna farm shows movement of large fauna through the fences, most probably kangaroo, emu and feral pigs. To keep these animals out of the landfill site will be a challenge.

Commercial beekeepers (including Ian McNamara, the York beekeeper) use adjoining properties for honey production. There are also many native bee species and other important pollinating insects in the area. Noxious airborne particles are already killing bees and destroying their habitat and landfills are known for the emission of noxious gases and particles.

Flora

What SITA is not telling us about Flora

The site is at the foot of the Mt Observation Wandoo National Park, where there are significant stands of *Eucalyptus wandoo* and *Eucalyptus accedens* considered in excellent condition. The understorey vegetation comprises very high quality, intact shrub flora that is likely to contain a number of priority taxa including rare orchids based on similar vegetation associated with nearby Wambyn Nature Reserve. Importantly, sand complexes associated with this eastern wandoo vegetation are hotspots for rare flora including remnant stands of the Declared Rare Flora, the scarlet lechenaultia, *Lechenaultia laricina* that has a major population on nearby Berry Brow Road adjacent to the Mt Observation Wandoo National Park.

Adjacent to the proposed SITA development is a major privately owned wandoo remnant comprising over approximately 100ha of high quality wandoo upland over laterite interspersed with sand plain and sandy drainage channels and granite exposures. This privately owned area, though surveyed in summer 2012/13, was in excellent condition and there was evidence of good stands of orchids (remnant flower heads). Therefore given the proximity to Wambyn Nature Reserve, the proposed landfill site needs surveying for rare or priority flora.

Both Wambyn Nature Reserve and the private reserve adjacent to the proposal site are high quality biodiverse assets of regional significance where any impact on ground water (through excavation that will interrupt local water flow) may have a significant negative impact on the dominant wandoo species. It is well established through research undertaken at The University of Western Australia (Professor Hans Lambers) that wandoo is highly susceptible to changes in hydrology and thus any decline in wandoo and other groundwater dependant shrubs will have direct and potentially irreversible impacts on these important remnant woodlands.

Importantly, large amounts of putrescent materials will undoubtedly interrupt local fauna, particularly pollinating insect communities that are important for maintaining the pollination of many local species including all orchid species including those at Wambyn Nature Reserve.

This reserve has one of the richest assemblages of orchids in the eastern wandoo with over 50 species recorded for the reserve including a number of priority species. It is considered by botanists from the Royal Botanic Gardens in Kew, UK to be a major orchid habitat globally following several visits over the past decade to the reserve by Professor Mark Chase and Dr Michael Fay from Kew.

Note: The above information was provided by Professor Kingsley Dixon, Visiting Professor, The University of Western Australia, School of Plant Biology.

Landcare groups, such as the Talbot Brook Land Management Association and other groups, with the help of many people and local farmers in the area, have been undertaking revegetation of the catchment and surrounding areas, some with funding from Government agencies. Hundreds of thousands of trees have been planted into the creek lines and waterways to revegetate the upper reaches of the catchment areas, including 6 Mile Creek, which runs into major rivers, and 13 Mile Brook with areas further upstream being revegetated as well. The proposed landfill will destroy years of hard work by local farmers and volunteers.

The proposed landfill facility will result in an unacceptable impact on the environment through direct loss of vegetation on site including likely species of protected flora and through indirect impacts resulting from the landfill including changes in hydrology, increases in weeds, pests and feral animals, and contamination of air, land and water resources.

Conservation Areas

The western boundary of the proposed land fill site is the Mt Observation and Wandoo National Parks. A Wandoo belt forms the majority of the National Park which also contains rare species of flora, including orchids, Powder bark-*Eucalyptus Accedens*, and *Capillosa*. There are caves in the area (Dingo Rock Cave) and other large rock formations which are unique to the area and have indigenous significance.

Mt Observation is in close proximity to the proposed landfill site. It contains a Convict Heritage site – a hut on Manyuering Springs that was built by convict labour when the Southern Highway was built. It has a large fresh water soak that was used to source water for stock and human consumption.

It is considered that the proposal for a landfill facility adjacent to the Wandoo National Park is likely to result in significant impacts on the National Park. These impacts include changes in hydrology likely to cause a deterioration in the health of the Wandoo forest; indirect impacts due to weeds, feral animals, dust, and windblown rubbish; and loss of amenity for visitors to the national park as a result of odour and noise, not to mention the visuals of a rubbish dump.

Safety of Water, Flora & Vegetation

Within a 2 km radius of the proposed site is among the richest in orchid diversity in WA. The BGPA commented that water draw-down may deplete the water table and have a lasting impact on Wandoo health and orchid diversity. The proponent has confirmed that the proposal does not include dewatering.

Western Australia's unique orchid diversity is a treasure we cannot afford to risk. The first we will know of the water table being drawn-down will be the extinction of the flora and vegetation, when it will be too late to save them. BGPA have alerted you to the risk. Knowing the track record for SITA (and other waste management companies), how can anyone with authority to protect native species (eg, DER) leave the future of these species in the hands of a multinational company whose reputation of saying one thing to get approval, then acting quite differently once given approval?

If SITA does not intend dewatering, exactly what will happen to Bore No. 6 water that was bubbling up and overflowing in the height of summer? This defies any credibility to SITA's claim that "the base of the landfill will be designed to maintain a minimum distance of 3 metres to groundwater...." In actual fact, the proposed landfill is sitting in the water table.

SITA's spokesperson, Nial Stock, and the 'experts' who accompanied him at their 19 November, 2012 presentation to those who filled York's Town Hall to overflowing, attempted to assure everyone about the safety of their containment practices to be put in place at the proposed landfill at Allawuna Farm in York. However, when he was pressed about the thousands of pages of information found online about SITA's violations of safety practices at other waste disposal sites they manage and the court proceedings against SITA, his exasperated reply was, "Well, sometimes we stuff up and we put our hand up and we say to the DEC we stuffed up, we're sorry, it was us. This is what we're going to do to fix it and we fix it." (Ref. DVD "York Public Meeting on the proposed Allawuna Farm Landfill", Questions Part 1, 35 minutes, Track 1). This certainly sounds like 'risk management', as another questioner described SITA's practices, no matter how they attempt to promote the safety of what they are proposing to bring to productive farmland next to water catchment areas with endangered native flora and fauna everywhere on and around the property.

Since that presentation by Nial Stock for SITA in November 2012, we have been noting the number of outright lies and misrepresentations being consistently perpetrated. Again during that presentation, Mr Stock described the section of Allawuna Farm designated for the landfill as "poor agricultural land" when, in fact, it is a most productive area, as others would have mentioned in their submissions to the EPA. Interestingly, SITA's first criteria for selecting this farm was its proximity to their transfer station in Welshpool – hardly placing much concern on the environment. Mr Stock had already mentioned there were no water, flora or fauna considerations – another 'plus' for Allawuna farm. Yet the exact opposite has been pointed out in great detail by those who have an intimate knowledge of and respect for the rare and / or protected flora and fauna located in and around Allawuna farm.

The numerous signs all around the 'Welcome to York' sign attest to the protection afforded the water catchment area surrounding Allawuna Farm. These signs seem to have been overlooked by SITA when evaluating the viability of choosing Allawuna Farm as ideal for a noxious landfill.

Exaggerated / Unsubstantiated Benefits to the Shire of York:

SITA states that most of their initial start up and annual operating costs will be spent in the Shire of York, therefore there will be many benefits for the town.

What SITA is not telling us:

Benefits to York Businesses

Nothing could be further from the truth. The civil works will be tendered state wide if not nationally, and the usual companies that have experience in building and lining these structures will win the work. The civil road works, leachate pond, storm water catchment, drainage work, weighbridge and infrastructure will similarly be tendered out state wide. Fencing work will go to the lowest tender and consumables will come from the bulk suppliers in Perth, not the local hardware stores.

Claimed annual operating costs of \$8-10 million to be spent in the Shire of York are grossly exaggerated. Running three loaders/traxcavators, a water truck and a weighbridge, even if they were hired, would be less than \$1.5million. This plant will be owned by SITA and the operating cost substantially less. Transport costs (cartage to the metropolitan based sub-contract trucks) will be a big proportion and of no benefit to the Shire of York. Each future cell construction cost will be spread out over the 3-5 years it takes to fill each one. Again none of this expenditure will be in York.

Employment

Rubbish tips are low volume employers. Three machines will push, bury and compact the imported waste, the sub-contract trucking fleet will be based in Perth where the transfer station(s) are located. Fuel will be delivered from Perth. Key people will be SITA's own staff. SITA states that any others could come from anywhere as is their employment policy. There is no employment benefit to York from this operation.

Interestingly, SITA's letter to the residents was sent a mere fortnight prior to their 19 November, 2012 presentation (which was not distributed to those who request 'No Junk Mail', an obvious ploy to ensure everyone would NOT know about the meeting). This advertisement-type letter was ignored by many who viewed it as more undesirable advertising to toss away (understandably because of the very small print, glossy paper and numerous photos) states a potential 8-10 people could be employed (implied 'local' people because our Shire planner had the word 'local' removed prior to printing, something I discovered through the FOI documents eventually supplied through external review being conducted by the Legal Officer in the Office of the Information Commissioner). Yet SITA have changed that figure many times in their numerous newspaper articles / promotional literature to range right up to 90 potential jobs for York. Wherein lies the truth, one must ask....

Traffic, Tourism & Safety

This site is located at the gateway to the agricultural and tourist town of York. The tourist traffic, the lifeblood of small business, will have to share Gt Southern Highway with a 75 tonne road train every 10 minutes or less. SITA say it's only a 3% increase in traffic, but each road train is the equivalent of 40 cars on an already inadequate road. SITA did not include in their figures the one million bank cubic metres (1.5 million tonne) of imported capping material and its trucking component.

Class 3 Waste

SITA have already amended their application to receive Class 3 rubbish and, as they already accept waste from a myriad of other operators, this tip will escalate with further applications if this one is successful. SITA play this aspect down and will only comment on this application.

The permitted leachate concentration for Class 3 waste exceeds the Australian Drinking Water Health Guidelines (ADWHG) by 100 times for each item on the list, the risk of the cumulative effect will be potentially much greater. Here are just a few of the materials permitted for the leachate and our underground water:

- Metals - arsenic, beryllium, cadmium, lead, mercury,
- Inorganic – cyanide
- Non-chlorinated organics – benzene, petroleum hydrocarbons, toluene
- Chlorinated organics – dieldrin, chlordane, 245D, heptachlor, DDT.

What SITA is telling us about Rubbish Transport along Gt Southern Highway

SITA only carried out traffic studies for Great Eastern Highway which is a dual lane carriage way from Midland to the Lakes/Great Southern Highway turn off. SITA claims there will only be a few percentage points increase in the traffic generated by their minimum of 6 road trains per hour.

In their current submission to the Shire of York, they go on to state:

“The risk matrices demonstrate that the increase in traffic resulting from the Allawuna Farm landfill will increase the risk of a fatality within each crash type only marginally and that the increased risk is still with the acceptable societal risk for fatalities.”

Therefore, SITA find it acceptable that there are going to be more fatalities. So who will these unlucky ‘extra fatalities’ be? Perhaps our unpopular CEO, Councillors, Shire Administrators, past Councillors who allowed the landfill to reach this stage and / or their families. Perhaps it will be our babies / toddlers, school children, parents, grandchildren, grandparents, future generations still not yet conceived??? When all this rubbish could more easily be transported by rail, how can we justify even one more fatality on an already RAC black marked Gt Southern Highway???

To add insult to injury, in an ABC broadcast in October 2013, Nial Stock from SITA was quoted:

“... the amount of trucks we are going to put on that road is not an issue, it doesn’t change the status of that road or the safety considerations of that road...”

What SITA is not telling us:

SITA failed to address the safety issues and concerns for Great Southern Highway in their submission to the EPA.

It is an interesting omission by SITA that no mention is made in their proposal of Gt Southern Highway’s suitability to carry the traffic that a landfill, situated approximately 26 km from the juncture with Gt Eastern Highway, will generate. In fact, the narrow width, poor alignment, inadequate camber on corners and lack of safety shoulders negate the viability of adding SITA’s volume of trucks and road trains to the traffic already using this main artery to York.

This road is hilly, single lane (‘highway’ is a misnomer) with only a few short double lane areas provided for passing. In fact, it is best described as a scenic country road. There are innumerable bends that require slower passage, some sharp turns, with no shoulders to allow a driver to safely pull off the road if necessary, especially if a truck has gained a lot of speed coming down a hill and attempts to maintain it in order to go up the next hill without losing too much momentum. Most people are not comfortable – even fearful – if they are tail-gated by a truck / road train. Kangaroo warning signs are in place so accidents could easily happen under such circumstances.

Just one road train – equivalent to 40 cars relative to congestion created – is enough to seriously affect easy passage along Gt Southern Highway. Often oncoming vehicles prevent

passing where it is permitted, and the double lane sections are short and very far between. This road will become a bottleneck, most noticeable in the early hours of the morning when commuters are driving to a strict timetable. The drivers of emergency vehicles have expressed extreme dismay at the prospect of not being able to get through the traffic when time is of the essence. No doubt, risks will be taken with a further increase of deaths / injuries on what is already classified by the RAC as one of the most accident prone roads in the Perth area.

Interestingly, SITA claims there will only be a few percentage points increase in the traffic generated by their minimum of 6 road trains per hour. Yet, in reality, this equates to doubling the road train traffic on Gt Southern Highway, based on a vehicle count conducted by York residents from 6 am to 6 pm on Monday, 15th July, 2013.

What SITA is telling us about the amount of rubbish that will be transported along Gt Southern Highway:

SITA's present share of the metropolitan rubbish business is around 30%. According to their October Update presented to council, their cartage contractors will operate a daily 12 hour shift to move the claimed 250 000 tonnes per annum (tpa) to the Allawuna site.

What SITA is not telling us:

It is no secret that the anticipated waste to be generated by the Perth and Peel regions will shortly be in excess of 3,000,000 tpa, projected for 2020. By applying a little schoolboy math, SITA (should their proposal be successful) will be importing 1 000 000 tpa into Allawuna and the truck fleet and density will be four fold that which is being applied for now. This translates to a road train every 2.5 minutes, laden and empty, on the Lakes to York road, twelve hours a day.

This does not include the 6 000 000 tonnes of imported capping material required (1 500 000 tonnes previously stated) and which will demand a separate trucking fleet on the road. This road, the gateway to York, will resemble a single lane Roe Highway.

Metropolitan councils have "...called upon the State Government to intervene and establish a body to coordinate and oversee managing waste across the metropolitan area." The solution to this metropolitan problem is not the ad hoc dumping of their rubbish into landfill sites in the peri urban areas of York, Toodyay, Bannister, etc. Their considerations will be economic, not environmental, to the detriment of these (and, inevitably, other) rural Shires.

It is seen by AVRA to be extremely unjust that the by-product of waste streams generated by commerce, industry and private enterprise – mainly located in the Metropolitan area and from which profit and income is derived – should become the liability of the Shire of York.

From AVRA's research, aimed at overturning the Allawuna proposal, we have been confronted with remarks such as, "The rubbish has to go somewhere!" and "It can't go in Perth anymore!" The basic premise should be to prevent the problems of huge disposal of rubbish to landfill, to engage the recommendations of reduce, reuse, recycle waste and, ultimately, as best practice, to use landfills as a last resort.

AVRA believes that the York Shire and other rural Shires should be extremely active in seeking a solution and engaging the State Government in developing the proper and sustainable mechanisms for waste management.

SITA has moved the goal posts for the type of rubbish to be dumped at Allawuna

In the original proposal presented to the York ratepayers at a public meeting in November, 2012, SITA proposed a Class 2 landfill for the site. Subsequently in 2013, with the submission of the Proposal to the EPA, the application was changed to a Class 3 landfill. During the months of the EPA determination, the Proposal was changed back to a Class 2, without any explanation.

What SITA is not telling us:

We believe the company was given advice that a Class 2 landfill would be more readily approved. In the history of landfill companies, it is often the case that once a landfill is established, it becomes easier to apply for changes to the facility to accommodate a different category of waste and to increase the volume. The *Biowise* composting facility run by SITA in McLaughlin Road, Kwinana, is a case in point. (Agenda, *Ordinary Council Meeting*, City of Kwinana, Feb 2013).

The *Wheatbelt Regional Plan 2010-13* (2012 Revision), an Australian Government Initiative, describes the Wheatbelt as a “valued natural amenity.” The report urges planning bodies to

- Lead the way in identifying opportunities to improve agricultural productivity consistent with changing environmental and climatic conditions
- Protect and manage the natural environment, particularly our water resources and biodiversity assets
- The protection of areas of high biodiversity in the region is essential and can be achieved through increased awareness and better land use planning and management (page 31)

We believe that the proposed landfill is a complete contradiction to all these recommendations.

The Shire of York also states:

- “The local environment needs to be valued and sustained during growth to ensure the rural aspect and the farming economy are respected and maintained.” (p 5)
- “Our Shire will be a place of community, where lifestyle choices are important and where community matters.” (p 6)
- And one of the goals of the Shire is to “maintain and preserve the natural environment during growth, enhancing the ‘rural’ nature of York, and ensuring a sustainable environment for the future.” (p 6)

Shire of York: Strategic Community Plan.

If a landfill is established on Allawuna farm, it could be argued that many people in the community have been disadvantaged for the benefit of a few others and of a multinational corporation. It could also be argued that the ‘rural nature of York’ would be compromised and the natural environment degraded. Cynics in the community may see these aforementioned documents as mere pieces of rhetoric, with important recommendations that are never acted upon.

Geology & Seismology

What SITA is telling us about Geology & Seismology

Independent experts' studies have found the proposed landfill would not have a significant environmental impact, including the geology and seismology, specifically covering the landfill's stability.

What SITA is not telling us

The reports completely ignore the latest information from Geoscience Australia, identifying York as the most likely place in Western Australia for an earthquake to occur. The hotspot that caused the Meckering earthquake in 1968 has, in the last 35 years moved west and is now located under the York Shire. (*Geoscience Australia* <http://www.news.com.au/national-news/australias-earthquake-hot-spots-revealed/story-fndo4eg9-1226519537825>)

If an earthquake of similar magnitude as Meckering, took place in York, any landfill site that relies on a high density polyethylene liner to separate the leachate from the water table, is bound to fail.

Information, mainly from the US indicates that this type of liner has failed, on a large number of occasions, under earthquake conditions. No information appears in any report on pseudo-static or pseudo-dynamic stress test on the liner material. If it did it would in all likelihood indicate that the landfill structure would fail. Liquefaction is also an issue not dealt with, a potential cause of pit failure. (*Geosynthetic Society of US*; http://www.geosyntheticssociety.org/resources/archive/gi/src/V5I1_2/GI-V5-N1&2_Paper9.pdf)

9.

In summary, the following important points should be considered:

Seismicity:

- The Avon-arc lies within the South West Seismic Zone (SWSZ), one of three active seismic zones in Australia (the others being Tennant Creek and SE Australia).
- The SWSZ is the largest of the active zones and is known internationally as the most unpredictable.
- The centre of the SWSZ is now York (Geoscience, 2013) (previously Meckering, then the Burakin locality), it has consistently incorporated Toodyay and York.
- Since 1968 there have been constant movements with 9 greater than Magnitude 5.
- The Meckering earthquake (Magnitude 6.8) resulted in earth movements that altered the underlying hydrology as far west as Wundowie (55km) and Bindoon Agricultural College (80km).
- Local history from York landowners testify to changes in hydrology- springs disappeared, bores became dry, and water sources appeared in different places.
- This was evident by the emergence of fresh water springs at Wundowie Wetlands & Bindoon College, and altered hydrology in many farm bores.
- Earth movement opens and closes fissures in the underlying geology, as do piezometers, bores and tree roots to create connections between soil, clay and rock layers through which water will travel.
- Paleoliquefaction studies indicated numerous 'sand blows' (liquefaction) occurred following the Meckering earthquake.

York Businesses

A very large number of motorbike riders of all ages are welcomed visitors to York and love to traverse the open, scenic roads into York. Earlier this year, a couple came into the gift shop to sign the petition which opposes the siting of the landfill near York, aghast at the prospect and its inevitable adverse effects on the uniquely historic town. They stated the

bike riders would no longer hazard travelling Gt Southern Highway if a constant flow of traffic / trucks / road trains obstructed their easy passage. They related what it was like before BGC created the double lane entry / exit into their pits, getting trapped behind the road trains that could only laboriously negotiate the steepness of the hills – yet that involved only a short distance from the intersection with Gt Eastern Highway. The thought of getting caught up for approximately 28 km behind and between the landfill traffic would deter these valuable visitors to York, an important source of income for the many small businesses they frequent.

People from all over the world and Australia, as well as residents from Perth and surrounds, have eagerly signed our petition in opposition to the landfill, amounting to well over 1 000 signatures to date. They are in disbelief that the government would even consider such a prospect that would do so much damage to such a special, historic town.

This would also impinge on the Common Law rights of York's businesses, who trade with the expectation of constant tourist / visitor clientele. I recently renewed the lease to the gift shop I manage for 3 years, with the expectation of unimpeded trade from visitors to the town. Instead, I am facing the dilemma of having that regular custom being deterred from coming to York. The town would not thrive without them.

The Destruction of York's Tourism Industry

York has a unique historic reputation, being the first inland town settled in WA. People from all over the world, as well as from all over Australia, choose to visit York because of this, along with its heritage and numerous heritage-listed buildings, many of them built by famous architects during the gold rush era. These buildings are different from what one sees in many other country towns, both in the large number displaying historic construction techniques and artistry (including stained / lead glass with historic references to its namesake, York in the UK) and in their size. Many are 2 storey and make quite a visual impact, especially where the main entrances face into the corners of intersections, as you typically find in Europe and the UK.

York's wide main street offers a view to Mt Bakewell, as one enters the town from the south, which is the highest point in York. This view is another impactful feature of the town.

York is only just over an hour's drive from Perth's CBD, therefore a very popular getaway destination for residents from Perth and surrounds. The scenery along the main road into York, Great Southern Highway, is beautiful to behold, offering a combination of rural life that is sought after for its quiet and calming effects, with cows and sheep grazing in many paddocks, crops gracing other fields, while untouched bushland offers another contrast and appreciation for what the land was like before it was farmed.

All of these groups of people bring invaluable business to York, which supports the local small businesses whose main trade is from the visitors / tourists. In fact, the shops all stay open from the end of the week and across the weekend / long weekend to accommodate the visitors / tourists. (We close our shops during the week, instead, if we are sole shopkeepers, in order to have time away.) We constantly have people saying how much they enjoy coming to York because of the types of shops and what the small shops have to offer – very different from the commercialized shopping common to the metropolitan areas. Many local artists / artisans / craftspeople sell their handmade wares through York's shops, including Settlers' Gift Shop, to the delight of our clientele.

Many visitors / tourists stay overnight (or longer) so provide invaluable clientele for the many B & Bs, farm stay, hotels and motel who cater to them. In fact, wedding parties often

choose two of York's more impressive and historically fitted B & Bs (Faversham House and Laurelville) for their venue and accommodation. This creates a lot of business for the restaurants, cafes and other shops, needless to say. People love the atmosphere and the friendliness they encounter everywhere. They also comment on the peacefulness and sense of relaxation they can enjoy in a country town like ours, eager to return.

They depart with wonderful memories and encourage friends and family to also visit York and all that it has to offer. Many customers in our gift shop say others who preceded them told them they had to go to York and find our shop! They never seem disappointed, either – in fact, quite the opposite, saying they would return with family / friends and would also spread the word.

Many visitors / tourists have come into Settlers' Gift Shop to sign the petition opposing the landfill, disbelieving that such a special town would be chosen for such a noxious industry. Some even have related stories of how they had been caught up in similar proposals where they live and united, as we have done, to prevent it going ahead. They also related how determined the proponents were to press ahead, never mind what the people said. Therefore, court cases ensued because the large corporations, only interested in the dollar return, would not accept 'no' for an answer. All of these people encouraged us to press ahead as united residents against corporate invested interests, no matter how long it takes to succeed to preserve something too valuable to allow big business greed to destroy.

Then there are the many bike riders for whom Gt Southern Highway is a classic ride on a scenic country road (internationally famous and not designed for heavy haulage vehicles). I have been told by a couple that they would no longer use Gt Southern Highway if they had to follow a relentless chain of road trains carrying rubbish.

Precautionary Principle

Has anyone in 'authority' considered the 'Precautionary Principle' which is an internationally recognised principle with a working definition of: *"When human activities may lead to morally unacceptable harm that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm"*?

Morally unacceptable harm refers to harm to humans or the environment that is:

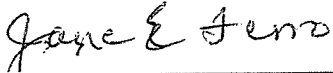
- Threatening to human life or health, or
- Seriously and effectively irreversible, or
- Inequitable to present to future generations, or
- Imposed without adequate consideration of the human rights of those affected
- Site of high public interest, eg recreation, scenic

An Important Reminder:

Before you throw out the justification of 'economic development' as your reason for considering allowing a seriously noxious industry to gain a foothold here, let me remind you of all the very viable business proposals that were knocked back by our administration, then set up elsewhere. As one example, I was renting the house purchased by a young couple who took their proposed business, now thriving and employing 25 people, to Bruce Rock. Had the administration and Councillors smoothed the way for them as they secretly did for SITA (as evidence from my FOI documents proves), York would be a thriving community today.

I urge the Councillors to consider the future you are creating for your (and everyone else's) children, grandchildren and beyond who desire to call York their home, not just the vested interests of a very few in town. Also consider the legacy you will be leaving in the memories of the residents who elected you to your position, expecting you to represent the views of the majority.

Jane Elise Ferro

A handwritten signature in cursive script that reads "Jane Elise Ferro". The signature is written in dark ink and is positioned above a horizontal line.

York 6302
24 May, 2015

Records

From: Geoff William:
Sent: Monday, 25 May 2015 2:44 PM
To: Records
Subject: I147865 - FW: TBLMA Landfill Submission due 4pm tomorrow
Attachments: Submission-SITA-Proposal-2015.doc

SynergySoft: I147865

260

SHIRE OF YORK	
FILE	PS GEN-PRO. 3.1
OFFICER	INITIALS
KIRD	AK
25 MAY 2015	
REFERRED TO COUNCIL	
DATE	INITIALS

Please find attached our submission on the SITA proposal

Thankyou
Geoff Williams
Secretary
Talbot Brook Land Management Association inc.

Any opinions, judgements, conclusions, forecasts, predictions or estimations contained in this advice are made in reliance on information provided to Western Australian Treasury Corporation which Western Australian Treasury Corporation believes to be reliable. Western Australian Treasury Corporation, however, cannot guarantee the accuracy of that information. Thus, any recommendations are made in good faith but they must be carefully considered because they are provided only to assist you with any decisions which you make.

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This footnote also confirms that this email message has been swept by MIMESweeper for the presence of computer viruses.

www.clearswift.com

Talbot Brook Land Management Association Inc.

Postal Address: _____

Phone _____

The Chief Executive Officer
The Shire of York
PO Box 22
York WA 6302

records@york.wa.gov.au

24th May 2015

Dear Sir

**RE: Amended development proposal for the use of Allawuna Farm – Lot 4869(PT) 2948
Great Southern Highway, Saint Ronans – as a landfill site**

The Talbot Brook Land Management Association Inc. is expressing objection in the strongest possible terms to the proposed SITA amended development of the use of Allawuna Farm as a landfill site.

The proposed landfill site the S.I.T.A Group have provided an amended plan to locate at Allawuna Farm near York is in the upper reaches of the Helena Catchment area which feeds into Avon and Swan tributary as a part of the Mundaring Catchment area. One must question the validity to establish a site such as this on or near a water catchment and aquifer?

Hazardous toxins and domestic waste materials will be deposited through the landfill site and risk damaging an important human resource. What is proposed here has potential to damage the Helena catchment water resource. This is very short sighted. All our water catchments and tributaries and underground water resources should be protected from environmental vandalism. The 10 new boreholes drilled by Golder, together with the original 14 bores have now proven irrevocably that the entire aquifer under the landfill site drains into the Helena Catchment.

The Talbot Brook Landcare Management Association has worked on past projects with Swan River Trust and the Department of Water Northam to bring about the stabilization and nutrient eutrophication to these important tributary systems. Our Association has worked over the past decade to revegetate the upper reaches of 13 Mile Creek and 6 Mile Creek with of some 200,000 native seedling stems to stabilize, filter eutrophic nutrients from depositing further down these systems, endeavouring to halt these from entering the Avon and Swan river systems. We have established credibility with Funding and Government bodies for the completion of large projects to protect our environment from further degradation and destruction.

The 13 Mile Creek is adjacent to this proposed landfill site and if given permission to proceed, then our Association strongly objects to such a proposal and is alarmed that there seems to be a contradiction in Government objectives in the revegetation and environmental correction of the upper reaches of the Avon and Swan tributary and the establishment of a

Landfill site at the lower end of the same site without any concern for the environmental impact.

The areas west of York zoned General Agriculture include long established farmers. The pristine preservation of this Agricultural Zoning is essential to keep producing food for the domestic and international food chain where it is predicted world-wide demand for food supply will double by 2050.

Zoning of General Agriculture gives protection to the necessary collection of rainwater and groundwater for stock and human consumption. To consider noxious industries within this Zoning will contaminate all water collection and storage areas, jeopardise health of welfare of residents and animals and airborne contaminants which render crops, vegetable, fruit trees and all land unsafe within a very short period of time and probably forever.

Government Health and Biosecurity Regulations ensure airborne, soil, plant and water contaminants (e.g. Salmonella) and zoonotic diseases and viruses are controlled, detected and eradicated – i. e. Noxious weeds, feral animals (e.g. pigs, foxes, kangaroos, rabbits and birds).

Economic viability of General Agriculture will be threatened by encroaching noxious industries as proposed here. Of great importance also within the Shire of York and Western Australia as a whole is the preservation of the purity and supply of our rapidly dwindling water supply. It is a general occurrence that catchment areas are adjacent to General Agriculture Zones which act as natural buffer zones against contamination.

Shire of York Community Strategic Plan

“Environmental – Maintain and preserve the natural environment during growth enhancing the rural nature of York and ensuring a sustainable environment for the future. Support sustainable energy and renewable resource choices”

“Biological diversity is best conserved insitu although all levels of government have clear responsibility, the co-operation of conservation groups, resource users, indigenous peoples and the community in general is critical to the conservation of biological diversity”

What is proposed here is against the Shire of York Community Strategic Plan key points listed above. Protection of the environment is a responsibility shared by all levels of Government, industry, business, communities and the people of Western Australia

The objective of a General Agricultural Zone as described in the Shire of York Zoning Table AMD9GG17/1/03 states:

“4.15.1 (a) To ensure the continuation of broad-hectare agriculture as the principal land end use in the district encouraging where appropriate the retention and expansion of agriculture activities

4.15.1.(b) To consider non-rural uses where they can be shown to be of benefit to the district and not detrimental to the natural resources or the environment”

Industry Extractive

**Precautionary Principle No 1 – where there are threats or irreversible damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.

Decisions should be guided by – (a) careful evaluation to avoid, where practicable, serious or irreversible damage to the environment and (b) an assessment of the risk-weighted consequences of various options.

Industry Noxious

We oppose these Amendments within the Rural, Residential and General Agricultural Zone. Any proposals which affect General Agriculture Zoning submitted to the Shire of York should be circulated to all electors and residents before recommendation made by Council staff and/or any decisions are made by Council.

****Precautionary Principle 2 A 1** – Sound environmental practices and procedures should be adopted as a basis for sustainability for the benefit of all human beings and the environment today while considering the environmental, social and economic needs of future generations.

****Precautionary Principle 2 B 2 A** – Decision making should be guided by a careful evaluation to avoid serious or irreversible damage to the environment wherever possible and:

2 B 2 B An assessment of the risk weighted consequences of the options.

Industry Hazardous

We oppose these Amendments within the Industrial and General Agricultural Zone. Any proposals which affect the Industrial and General Agriculture Zoning submitted to the Shire of York should be circulated to all electors and residents before recommendation made by Council staff and/or any decisions are made by Council.

****Precautionary Principle 2 A 1** – Sound environmental practices and procedures should be adopted as a basis for sustainability for the benefit of all human beings and the environment today while considering the environmental, social and economic needs of future generations.

****Precautionary Principle 2 B 2 A** – Decision making should be guided by a careful evaluation to avoid serious or irreversible damage to the environment wherever possible and:

2 B 2 B An assessment of the risk weighted consequences of the options.

Resource Recovery Facility

We oppose these Amendments within the Industrial and General Agricultural Zone. Any proposals which affect Industrial and General Agriculture Zoning submitted to the Shire of York should be circulated to all electors and residents before recommendation made by Council staff and/or any decisions are made by Council.

****Precautionary Principle 2 A 1** – Sound environmental practices and procedures should be adopted as a basis for sustainability for the benefit of all human beings and the environment today while considering the environmental, social and economic needs of future generations.

****Precautionary Principle 2 B 2 A** – Decision making should be guided by a careful evaluation to avoid serious or irreversible damage to the environment wherever possible and:

2 B 2 B An assessment of the risk weighted consequences of the options.

Waste or Resource Station

We oppose these Amendments within the Industrial and General Agricultural Zone. Any proposals which affect the Industrial and General Agriculture Zoning submitted to the Shire of York should be circulated to all electors and residents before recommendation made by Council staff and/or any decisions are made by Council.

****Precautionary Principle 2 A 1 – Sound environmental practices and procedures should be adopted as a basis for sustainability for the benefit of all human beings and the environment today while considering the environmental, social and economic needs of future generations.**

****Precautionary Principle 2 B 2 A – Decision making should be guided by a careful evaluation to avoid serious or irreversible damage to the environment wherever possible and:**

2 B 2 B An assessment of the risk weighted consequences of the options.

No. 46 Page 24 Industry Mining

We oppose the Amendment within the General Agricultural Zone. No consideration to be given to proposals of this type within General Agriculture.

**** Precautionary Principle – 2 D 2 (i) – the close traditional association with Western Australia's indigenous peoples with components of biological diversity should be recognised and should the desirability of sharing equitably the benefits arising from the innovative use of traditional knowledge and biological diversity.**

Waste Disposal Facility

We oppose the Amendment within the General Agricultural Zone. No consideration to be given to proposals of this type within General Agriculture.

****Precautionary Principle J –Integrated Environmental Management**

If approaches to managing impacts on one segment of the environment have potential impacts on another segment the best overall environmental outcome should be sought at a local, landscape, catchment and/or regional level.

Geoff Williams (TBLMA Secretary) on behalf
Talbot Brook Land Management Association Inc.

References: ****Precautionary Principles Environmental Protection Agency**
Shire of York Community Strategic Plan

Records

From: Glenn & Kay Davies
Sent: Monday, 25 May 2015 1:30 PM
To: Records; Kira Strange
Subject: I147863 - SITA - Allawuna Landfill Objection Submission
Attachments: Allawuna_Perennial horticulture.pdf; Allawuna_Annual horticulture.pdf; Allawuna_Dryland cropping.pdf; Allawuna_Grazing.pdf; Allawuna_Vines capability.pdf; DAFWA Salinity use sheet.pdf; SITA BORES salinity.docx; Avon Civil Engineering.PDF; 20131115 Minister for Planning re York landfill.pdf; Objections to the SITA proposal- Shire of York - Kay Davies.pdf

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Importance: High

SynergySoft: I147863

Hi Kira,

Please find attached my submission and documents relating to the SITA Allawuna Landfill Proposal.
Thank you.

Kind regards
Kay Davies

SHIRE OF YORK	
FILE	PS GEN. PRO. 3.1
OFFICER	INITIALS
K. RA	
25 MAY 2015	
REFERRED TO COUNCIL	
DATE	INITIALS

Shire of York
P O Box 22
York WA 6302
records@york.wa.gov.au

25th May 2015

To The Commissioner James Best, the Shire of York and all Councillors,

RE: Landfill Proposal by SITA on Allawuna Farm – Lots 9926, 4869, 5931 and 26934 Great Southern Highway, St. Ronan's, York.

I have read the Allawuna farm landfill Executive Summary for SITA Australia November 2013, the Supplementary Report 2015 and the SITA works approval application to the DER 2015. I have attended all sessions concerning this matter at the State Administrative Tribunal. I have serious objections to this proposal.

I wish to make a detailed submission below of some of my concerns and the affects that the landfill will have upon our health, our property, our lives and that of our community, without prejudice.

PLANNING

1. Shire of York Town Planning Scheme No 2

On page viii of the Executive Summary for SITA, the **Shire of York Town Planning Scheme** is discussed and the objectives of general agricultural zoning given. Clause 3.2.4 of the Town Planning Scheme states that if the use of land for a particular purpose is not specifically mentioned in the Zoning Table and cannot reasonably be determined as falling within the type or class of activity of any other use the local government may:

- (a) determine that the use is consistent with the objectives and purposes of the particular zone and is therefore permitted; or
- (b) determine that the use may be consistent with the objectives and purpose of the zone and thereafter follow the advertising procedures of clause 7.2 in considering an application for planning consent; or AMD 9 GG 17/10/03
- (c) determine that the use is not consistent with the objectives and purposes of the particular zone and is therefore not permitted.

This proposal is not consistent with the objectives of the zone and therefore should be dealt with as in part (C). The “maybe” response given by Council to the landfill and “land use” is totally unacceptable and Council need to reject the proposal.

2. 4.15 General Agriculture Zone

The Allawuna proposal is not acceptable to the objectives of the **General Agriculture Zone**.

(a) To ensure the continuation of broad-hectare agriculture as the principal land use in the district encouraging where appropriate the retention and expansion of agricultural activities.

Landfill is not an agricultural activity and should not be placed in an area where it has the potential to destroy farm bio-security and cause health risk factors to food for human consumption. The landfill will not encourage expansion of agricultural activities but has the potential to curtail them due to the threat of contamination to the air, water and land. It does not make good planning sense to place a noxious and damaging industry in a

valuable food producing zone.

(b) To consider non-rural activities where they can be shown to be of benefit to the district and not detrimental to the natural resources or the environment

Landfill is detrimental to the environment and has no benefit to this area. This is a pristine clean agricultural environment, which will be affected by waste for many hundreds of years, if this proposal is approved and will no longer be able to be used for agricultural purposes.

Landfills produce dangerous toxins that will be released into our water ways and onto surrounding agricultural land over time. Everyone in this area relies entirely on ground and surface water with our only source of drinking water collected from roof tops. There is no scheme water available. If potable, ground and surface water become contaminated, these contaminants will be digested by humans and domestic animals, as well as the native flora and fauna.

Contamination to stock and produce by air, dust and discharge of contaminants to water systems have the potential to threaten the bio-security of our enterprise as well as the value of our property. Bio-security is an expensive, important and legally binding part of an agricultural business. The bio-security of a property is maintained by the keeping of strict records and rigorous farming practices. Farmers must legally ensure produce is fit for human consumption and sign legal documentation each time we sell to state this. If contamination occurs, we may need to be quarantined and be unable to sell our produce, which will destroy our commercial agricultural enterprises.

(c) To allow for facilities for tourist and travellers, and for recreation uses.

The landfill will not provide facilities for tourists and travellers or any recreation uses and I believe this proposal will have a detrimental effect on tourists and travellers to York, due to the offensive odour that will be produced along the journey from the large foul smelling trucks travelling along the already dangerous Great Southern Highway and the stench at the gateway to York and at Mt. Observation lookout and picnic area. Knowledge of the landfill and the trucks will discourage people from travelling to York. Anyone using Catchment road will be able to see the landfill and the contamination of the National Forrest due to litter will affect the aesthetic appreciation of the area.

(d) To have regard to residential use of adjoining land at the interface of the General Agriculture zone with other zones to avoid adverse effects on local amenities

The landfill proposal has already adversely affected the adjoining landowners as well as the residents of York. The community are extremely unhappy with the proposal, as shown in numerous meetings and petitions. Signatures were taken from 1200 residents on one day who voiced their opposition to the landfill.

Adjoining landholders will lose their bio-security as well as the decrease value of properties in York. We have invested our whole lives into our farm and feel that if the landfill is approved we will all lose millions of dollars, as our farm value has already decreased due to landfill speculation and the enjoyment of living in this area and savouring the beauty that is unique to our properties.

This proposal challenges our property rights and our water rights, having the potential to seriously affect property output and income. As we run our property using bio-dynamic principals this will seriously affect our ability to continue doing so and severely affect our income and state of mind. It must be remembered that farmers' lives are spent working outdoors in our natural environment, enduring all weather types for 12 to 14 hours a day. We are exposed to the air, dust, odour, wind, rain and noise every day. We cannot run our properties or tender animals from the comfort of an office or vehicle. We cannot escape the affects that pollutants have on us or even know when we are being poisoned by odourless toxins. We know that we will be exposed everyday of the year. Any change to the quality of air and water will seriously affect our health and that of our animals and that

is something we cannot live with. The landfill will have serious affects upon the health and well being of people living on surrounding properties, causing unnecessary stress and possible suicide.

3. From a planning aspect this proposal is not consistent with the objectives of the **Shire of York Strategic Community Plan** and its environmental goals.

a) **Social: Strengthen community interactions and a sense of a united, cohesive and safe community.**

b) **Vision: We will engage and listen to our community, advocate on behalf of our community, be accountable and manage within our governance and legislative framework.**

The landfill has proven to be a controversial proposal. Most of the York community have unity against the proposal and are feeling frustrated and angry at the York Shire Councillors for not discussing the proposal. The proposed changes to our town planning scheme to allow landfills within the York shire have only promoted greater aggravation and mistrust. The landfill proposal has not made the community feel safe and has caused the community to feel betrayed and lied to by its representatives and this has caused disharmony amongst everyone. Many community members have been personally threatened by the owner's of Allawuna, which has made people feel extremely unsafe and vulnerable. We feel that Council is not acting on our behalf and has been given incorrect direction governing against the wishes of the community.

c) **Environment: The preserving and sustaining of our natural environment.**

A landfill does not preserve or sustain it pollutes and destroys. Not only will the land be destroyed here but the surrounding flora and fauna will be adversely affected by the introduction of toxic waste. Valuable food producing land if contaminated will no longer be able to be used to sustain the people of Western Australia. Because the proposed landfill is adjacent to Mundaring Weir catchment, there are also real concerns about contamination to catchment area and to the drinking water for people living in Perth and regional areas as far as Kalgoorlie who rely on this water.

d) **Economic: Value, protect and preserve our heritage and past.**

The landfill does not protect and preserve Allawuna and the surrounding agricultural properties, which form part of our history and heritage. St Ronan's has a rich history being part of the road travelled by early settlers. A township was once planned for St Ronan's, as it possesses an important well which was used by all travellers through the area and has significant importance to the Aboriginal Ballardong People. The landfill will de-value the surrounding properties and contaminate Allawuna and the St. Ronan's area for hundreds of years, leaving an undesirable legacy for our future generations.

HERITAGE - ST. RONAN'S WELL

For nearly 100 years St Ronan's Well, York assisted in the development of the agricultural districts to the east of Perth's coastal plain. It was regularly and heavily used by travellers using the York Road, from the earliest days of settlement until motorised transport reduced the need for regular watering holes as time spent on the road was significantly reduced. (Criterion 2.2)

The arrival of convicts in Western Australia in 1850 finally enabled the colony to implement a public works program that encompassed the construction of roads, bridges and public buildings. Convicts and ticket-of-leave men were responsible for much of the maintenance of the York Road, clearing out the stone well at St Ronan's Well, York and they also constructed the smaller brick lined well. (Criterion 2.2)

St Ronan's Well, York is associated with the public works program that was implemented

and supervised by the Royal Engineers and the Royal Sappers and Miners who were brought out to assist with the Convict Establishment.

(Criterion 2.2)

St Ronan's Well, York was the temporary location of a road party station during the 1860s. These camps were established to accommodate work parties that were required to spend an extended period of time in a particular area repairing roads or bridges. (Criterion 2.2)

The granite lined well at St Ronan's Well, York displays artistic and technical excellence through the carefully shaped granite stones that have been used to line the well. Granite is a hard rock and requires some skill to dress so that the stones fit together neatly. (Criterion 2.4)

11. 3. SCIENTIFIC VALUE

The historical documentation definitely indicates that a road party station was established at St Ronan's Well, York, however the exact nature of this station and its longevity are not known. Little is known about these types of camps and the structural remains found near the wells may shed some further light on the occupation at this site and this type of road camp in general. (Criterion

3.2)

11. 4. SOCIAL VALUE

Folk-lore plays an important role in any society and St Ronan's Well, York has developed its own mythology both in the origins of the name and the usage to which the site has been put to over the years. The people of York and also the wider community value these myths. (Criterion 4.1)

St Ronan's Well, York contributes to the people of York's sense of place as it was associated with the town's early growth and the successful development of York as an agricultural district. The place also has connections to the York

Hiring Depot through the establishment of a road party station and the convicts and ticket-of-leave men based at the Hiring Depot who would clean out the well. (Criterion 4.2)

12. DEGREE OF SIGNIFICANCE

12. 1. RARITY

St Ronan's Well, York is understood to be one of the earliest stone wells constructed in Western Australia along a main transport route to provide water for travellers and is also the earliest well sunk along the York Road. (Criterion

5.1)

St Ronan's Well, York is an uncommon example of a well, and its associated reserve, that has survived to the present day along a main road that is still easily accessible. (Criterion 5.1)

St Ronan's Well, York is a rare example of a convict well associated with an earlier, intact well. (Criterion 5.1)

<http://inherit.stateheritage.wa.gov.au/Public/Content/PdfLoader.aspx?id=b1482037-15bc-41f2-a751-5bc12b2111b3&type=assessment>

The landfill has the potential to contaminate St. Ronan's well and destroy a rich and important part of our history.

e) Our Vision: Our environment will be preserved for future generations, protecting viable rural land, whilst our town grows and develops.

The landfill will not preserve our rural land for future generations. It will destroy it leaving a legacy of polluted and contaminated land and waterways for hundreds of years. It will do nothing to enhance the growth of York but instead significantly affect the tourist industry.

At SITA's first presentation the figure stated for employment was 6. This figure has grown from 6 to 18 to 24 and then 90 full time generated jobs. We have now been informed that the landfill will be managed by Avon Waste. Councillors need to realise SITA's information

has many discrepancies, which undermines their credibility. Contract drivers will be coming from Perth with loads of waste; they will live in Perth and return to Perth to leave the trucks at night. Fuel will be purchased in Perth where trucks will also be maintained. On site jobs may already be occupied by trained staff, that hold these positions at SITA's South Cardup operation. I have spoken to an Avon Waste representative who said they have not agreed to manage the landfill and they are not in a position to cart waste to the site, as they do not own trucks large enough to perform this task.

Allawuna is approximately 23 km from York and 25 minutes to Mundaring. It is close to Baker's Hill and Wundowie where equally all employment could be sourced from. SITA's continual argument that this proposal will benefit York's employment is unjustified and a statement made without any factual proof.

York will not benefit from a down turn in tourism, which our research has shown will occur or where the \$9 million expenditure would possibly occur in the York Shire. Tenders will be called for, to bid on all work done at the site and there is no written guarantees tenders will be won by York businesses.

:We will sustain and enhance our rural identity and natural aspects within our thriving natural environment, ensuring our natural environment is protected and enhanced.

:Our viable farming land will be protected.

Landfills do not protect or enhance rural land or the natural environment nor will it make it thrive. The disposal of waste into landfill causes pollution and contamination of the environment and risks to human and animal health. The fact that Allawuna, a pristine high food producing property will have a landfill area on it that can never be used again as food producing land is criminal. The effects over time that an old landfill site can have upon the environment are well documented, which means that the groundwater and land surrounding the pit will be forever in danger of contamination. If pathogens enter groundwater they will cause contamination to surrounding properties, the catchment area and the Mundaring Weir water source, which supplies potable water to thousands of households. This proposal is not protecting viable farm land it is destroying it.

f) Economic Development:

One objectives is: Facilitate sustainable and managed development

One priorities under this objective is: Protect primary agricultural areas through effective land use management.

A covenant has been placed on part of Allawuna to protect the environment and states this area is sensitive and needs protecting and shows a level of concern about land degradation and salinity. Allawuna needs protecting from the potential to contaminate it with leachate, emissions and emission of toxins for which there is no easy solution to rectify when it occurs. The covenant states to refrain from injuring trees and refrain from any activity on the land that might inhibit the regeneration of native vegetation. The landfill threatens the natural vegetation that surrounds the property as well as the area mentioned in the covenant. Signs from the Water Corporation are located along a large portion of the property boundary and warn of the areas sensitivity asking people to report pollution and stating a fine to those who do pollute. This only strengthens the case as to the unsuitability of this site. If the sensitive native bushland is affected by degradation from toxins it will cause a chain reaction, effectively producing further degradation to the surrounding property and catchment area. The proposed road into the landfill runs directly through the land protected by the covenant and will mean that much of this will be cleared to provide greater access to the property. There are many *Nuytsia floribunda*, known locally as the Christmas Tree, which are important to the local Nyungar people, which will be destroyed

to obtain access.

The landfill is located next to a wet tributary of 13 Mile Brook. Ground water is being forced to the surface in a bore (MB06) within the landfill site. This area receives 500mm annual rainfall not 381.0 mm as SITA states and is subject to flash flooding and increasingly frequent damaging weather. Leachate dams are to be positioned on a slope above 13 Mile Brook. Contamination of waterways will occur during flash flooding. The potential to cause harm and to contaminate surrounding primary production properties is extremely high, which could cause these properties to no longer be used for their original purpose. Landfill is not an effective use of pristine and highly viable farmland. It is inconceivable that a landfill can be considered in a sensitive area or near one and SITA be given permission to override the environmental protection notice and clear further sensitive vegetation.

4. This proposal is not consistent with the Shire of York's **Local Planning Strategy**. The objectives of the strategy are to protect sustainable agricultural production, preserve and enhance the environment and natural resources and to protect the National Parks, State Forrest and associated water catchments. The landfill will not protect, preserve or enhance but instead has the potential to contaminate our National Parks, State Forrest and associated water catchments. When water contamination occurs it will not only affect the flora and fauna but also the potable water for many thousands of people in WA.

5. This proposal is not consistent with the **Avon Arc Sub-Regional Strategy and the Wheatbelt Land Use Planning Strategy (WLUPS)**. The key issues of its objectives are the protection of agricultural land and avoidance of land use conflicts and protection of scenic values. The key guiding principals are preserving the cultural heritage of the region; conserving and enhancing the natural environment; recognising agriculture as a significant land use and economic activity; improving the landscape value; promoting, protecting and expanding a regional greenway system; encouraging tourism activities which provide a net benefit to the region.

The landfill proposal works against all these objectives as it does not conserve, preserve or enhance. Landfill does not improve value or protect but instead treats agricultural land as if it is unimportant and insignificant in the Shire of York. This landfill will not only affect Allawuna but all surrounding properties, which will not benefit the region.

6. This proposal is not consistent with the objectives of the newly released **State Planning Policy 2.5 - Land Use Planning in Rural Areas** published in the Government Gazette on 27th November 2013.

Part 4. Objectives of this Policy

- a) To protect rural land from incompatible uses by –
 - I. Requiring comprehensive planning for rural areas
 - II. Make land use decisions for rural land that support existing and future primary production and protection of priority agricultural lands, particularly for the production of food; and
 - III. Providing investment security for the existing and future primary production sector
- b) To promote regional development through provision of ongoing economic opportunities on rural land
- c) To promote sustainable settlement in, and adjacent to, existing urban areas
- d) To protect and improve environmental and landscape assets
- e) To minimise use conflicts.

It is obvious that the landfill has caused major conflicts within all sectors of the York community. Landfill does not protect rural land from incompatible use or support existing primary producers, nor the production of food, it will only cause contamination and degradation of agricultural land and the loss of valuable food producing properties. Investment security has already been compromised with the reduction in value of agricultural land in the area due to the speculation of the landfill.

Part 5.1 Protection of rural land

- a) land use change from rural to all other uses is to be planned and provided for in a planning strategy or scheme;
- b) land identified as priority agricultural land in a planning strategy or scheme is to be retained for that purpose;
- c) beyond its principle function for primary production, rural land is also required for public purposes, natural resource management, biodiversity conservation and protection of landscapes and views;

Allawuna is zoned General agricultural with the land use stating it is for agricultural use. The landfill does not comply with our planning strategy or scheme for this area and should therefore not be allowed. This area needs to be retained as an agricultural area as it is important to the survival of WA, as a invaluable food producing area. Many of the surrounding farmers have worked tirelessly to preserve natural resources in the area and to conserve the land for future generations. All this work would be destroyed when contaminants from the landfill enter our environment and cannot be recovered.

Part 5.8 Avoiding land use conflicts

The introduction of sensitive or incompatible land uses such as additional housing or accommodation in rural areas can compromise rural land uses and effectively sterilise rural land. Incompatible land uses may also include uses that are acceptable in a rural zone but have a negative impact on other rural land uses. Such land uses include broadacre farming which may produce a spray drift that subsequently impacts on vineyards or market gardens, or the impact of rural industry on rural land uses within the locality. There is a need to ensure that existing rural land uses are protected and landholders are able to exercise their operational needs effectively and appropriately.

Similarly where rural living land use is identified in a strategy or scheme, there is a need to ensure such land use will not be subject to hazards and adverse health and amenity impacts.

7. The Allawuna landfill is not a protection of rural land but the destruction and sterilisation of it. The placing of waste is incompatible with the surrounding area, including an area that is suppose to be protected by a soil conservation covenant and will have an extremely negative impact upon the region. This proposal has caused nothing but conflict since the community first become aware of it with support against the landfill continually mounting. The proposal does not fit the objectives and ideals the community and the Shire of York have, it is an atrocious planning decision and should therefore not be permitted.
8. Members of Parliament have visited the site and have stated it will have an effect on the scenic value and will affect the York Shire and its tourism industry. Local government have been instructed to include landfill as a prohibited use on agricultural zoned land by the Minister of the Environment Hon. Albert Jacobs. With this in

consideration, it is questionable as to why the SITA's proposal has not been rejected sooner. Attached is a letter from Minister John Day and although it is several years old due to the length of process and appeals with this proposal it does state that Great Southern Highway is not an appropriate road for SITA type trucks nor is it an ideal entry point to WA's first inland town, York.

9. Physical infrastructure and the consideration of waste management alongside services such as power, water and transport need to be considered. Power is not suitable in this area. Water is a sacred and a scarce commodity in this region with no scheme water available and the proposal lies adjacent to environmentally sensitive land and water catchment area. The major transport route along Great Southern Highway is unsuitable for waste industries. This road was planned to service rural communities, tourism and agricultural activities and it is important that this area is not encroached on by non-compatible land uses such as waste management, which is continual high volume, heavy transportation. Allawuna is zoned for agricultural purposes, and all future proposed land uses must be consistent with this zoning.

This proposal is not consistent with the York Town Planning Scheme nor is it correct and orderly planning particularly in the light of the newly released State Planning Policy 2.5 - Land Use Planning in Rural Areas, but more an ad hoc response to planning and we ask that the landfill proposal be rejected.

10. INFORMATION ON OUR PROPERTY & THE LANDFILL EFFECTS:

Avon Loc 9386 Great Southern Highway, St. Ronan's, York WA 6302

We have a mixed farming property near the proposed landfill site, which we have farmed for 40 years. For the last 23 years we have used Bio-dynamic principals (similar to organic) and are identified in SITA's document as being 668 m from the Allawuna boundary. This proposal seriously threatens our bio-security and bio-dynamics principals.

We produce grain, sheep and cattle and have spent years creating a trusted data base of local customers, who value our bio-dynamic farming practices. We sell our beef directly to our customers cut, packed and ready to eat. Contamination to stock will destroy our biosecurity. If contamination occurs, we may need to be quarantined and be unable to sell our produce, which will destroy our commercial enterprise. Glenn and I could not live with the thought that produce we sold was contaminated and have serious affects upon someone else's health.

We participate in a research programme with Entomologists from the Department of Agriculture WA collecting insects from our property for research to discover why we do not have problems that many other farms have with insect pests from the use of chemicals. Contaminated dust, air and water sources from the landfill would affect our common law rights as well as ability to continue this research if our property is contaminated.

Everyone in this area relies entirely on ground and surface water with our only source of drinking water collected from roof tops. There is no scheme water available. If potable, ground and surface water become contaminated, these contaminates will be digested by humans and domestic animals, as well as the native flora and fauna.

This proposal challenges our property rights and our water rights, having the potential to seriously affect property output and income. SITA have made broad statements, without any knowledge of farming and the agricultural industry or the potential affects upon these industries. We have never received any mail outs from SITA and they have never personally contacted ourselves or any other farmers in the area to discuss any possible affects upon our farming operations or to gain knowledge of what these businesses actually produce and how they will be affected. SITA have shown no consideration to farming practices and the demise their landfill will cause.

Glenn's family have lived in the York area for 6 generations and farmed this property for 3 generations, tending and protecting our environment with the hope that our sons will have the opportunity to do so in the future. We have invested our whole lives into our farm and feel that our future is now uncertain as we do not want to live with the effects of a landfill upon human health and environmental destruction.

11. Contamination from the landfill would affect the common law rights of surrounding properties and as such there would be recourse by law for;

- a) Impacts on biosecurity
- b) Any loss of current and future revenue from adverse impact on biodynamic operations, groundwater contamination of bores and dams.
- c) Any adverse affects on health of persons and/or stock attributed to water or wind borne contaminants
- d) Any loss of reclamation of water lines and reforestation.
- e) Reduction in UV and GRV property values will affect the rates paid.
- f) The costs of potential leaks and resulting clean ups.

12. THE LANDFILL PROPOSAL

This area is not only prone to strong winds but frequent unexpected violent storms and willy willies. SITA have proposed to erect a fence around the site of 1.8 m in height in an area adjacent to Mundaring water catchment. This will not be suitable to stop rubbish from becoming airborne and contaminating catchment area and surrounding agricultural land with willy willies often lifting straw hundreds of meters in the air. This is a danger to both water systems and flora and fauna, as well as stock for human consumption who can digest the rubbish. We have seen the affects from the wind on our own property with dust and vegetable matter being lifted into the air and taken great distances. The height of the fence is too low and rubbish will never be able to be recovered in a storm event from Mundaring Weir catchment area as it is so large an area with very difficult terrain.

Henderson Landfill and Muresk were used to measure odour and winds. SITA have had the opportunity to study Allawuna for several years and collect data from the actual landfill site but have failed to do so. Because a site is said to be similar does not mean it is the same. This area is prone to extremely strong winds at least 80% of the year often weeks at a time with winds of 45 km/h often gusting up suddenly. SITA have failed to use its time during this process to collect data at Allawuna that could then be used correctly for this proposal. They have failed to produce proof of what they are stating, even when they had the opportunity to do so. The public concern about the likely effect of the proposal, if implemented, on the environment is extremely high within the community. The onus has been placed on the community of York to show why this landfill is unacceptable to the environment yet all access has been denied to "Allawuna". If the proposal proceeds, secrecy will still be an issue, as the site will be self monitored. We believe that SITA have failed in their duty to research, test and prove that Allawuna will not have dire environmental consequences especially to air quality, odour, noise and emissions to water and land.

Through this whole process SITA have continually used different figures and changed information that they presented to the public, EPA, DER, SAT and the Shire of York. This has made it extremely difficult to assess this proposal. SITA need to be able to state all the figures from the class of waste, employment figures, traffic figures, water flowing direction and data once and maintain these figures to be true and correct, instead of continually changing this data making it impossible to evaluate the proposal correctly and making its

affects unmeasurable.

SITA have stated land capacity figures in their Supplementary Report dated February 2015. Attached are maps from DAFWA exclusively for Allawuna. The maps show that Allawuna has a >70% of land with moderate to high capabilities for dryland cropping and grazing, >70% of Land has high capability for vines capability and perennial horticulture and 50-70% of Land has high capability for Annual horticulture. This proves the high capacity capabilities of Allawuna and disputes the implications that SITA have made.

13. BORROW PITS

The inclusion of three Borrow pits, to be excavated over a 10 year period, in my opinion significantly changes the SITA proposal. The Borrow pits should be treated similarly to an Extractive Industry. SITA are in fact extracting 856,000 cubic metres of soil from Allawuna and carting this soil to the landfill site instead of selling it as in an Extractive Industry.

The Borrow pits themselves will cover an area of approximately 20ha and approximately 5 m deep and will seriously change the landscape of Allawuna. Borrow area 2 will extract soil from a waterway and will affect how water will flow from this tributary into 13 Mile Brook.

The Borrow pits will decrease the amount of land that can be used for Agriculture and increase the affects of the landfill upon the environment. Even after the top soil is placed back into the pits, the pits will leave large depressions in the ground and will not sustain crops as they do at present, especially if the excavated area consists of a hard clay base.

Soil extraction will occur 6 days a week and cause serious dust and noise issues for the surrounding area. High winds, which occur over long periods at St. Ronan's will cause dust not only at the time of extraction but also on the bare ground in the pits and along the dirt route that the trucks take from the pit to the landfill site. The dirt route further destroys farmland and changes the way water flows across Allawuna, adding to the total footprint that is actually being affected by this proposal.

14. AMENITY

The test for assessing the amenity of a locality typically arises from paragraph 304 of Tempora Pty Ltd v Shire of Kalamunda in 1994, 10 SR (WA) 296 in which the SAT outlined three questions of fact that need to be determined in assessing amenity:

- a) The existing amenity;*
- b) The manner in which the proposed use will affect the existing amenity; &*
- c) The degree of impact on the locality.*

The landfill proposal has already adversely affected the adjoining landowners as well as the residents of York, causing extreme stress and a downturn in property values. The community is extremely unhappy with the proposal, as shown in numerous meetings and petitions. Signatures were taken from 1200 residents on one day who voiced their opposition to the landfill.

Justice Barker outlined in paragraph 48 of the decision of Canning Mews Pty Ltd and the City of South Perth in 2005, WASAT 272, where the Tribunal recognised that: "Residents of a locality are often well placed to identify the particular qualities and characteristics which contribute to their residential amenity. This can include visual amenity".

Justice Barker makes a strong point which is extremely pertinent in this situation. The local residents of St. Ronan's do know this area extremely well. The constant noise of beeping and movement of heavy machinery and heavy haulage trucks will vibrate through the whole valley and be heard for many kilometres away, threatening the peaceful existence we now enjoy. This is an extremely quiet and peaceful area. We do not have the same

constant background noises that are present in the metro area and in built up areas elsewhere, so therefore a singular noise can be heard over extremely long distances. Because of the tranquillity and lack of structures to act as noise barriers, the increase in noise and constant machinery working will be extreme to all residents and have a profound effect upon our quality of life. The Borrow pits will seriously add to the affect of impacting our amenity with dust and noise and SITA plan to continue this over at least a 10 year period.

15. GREAT SOUTHERN HIGHWAY

Unnecessary air pollution and road use will be caused from trucks and light vehicles travelling to and from the landfill site and the Borrow pits. Great Southern Highway is extremely dangerous and not a suitable road for the road trains to travel. The amount of traffic the landfill will place on the road will cause extra stress on users and the stench caused by following waste trucks will deter tourists from coming to York. We believe that the figures stated by SITA are incorrect especially if we consider the importation of 1 million cubic metres of soil to build the sites road structure, the importation of water for dust control and soil to cover the pit each day and the increase in waste that will be brought to the site as the population of Perth increases. Great Southern Highway is already a hazardous road to travel and we have seen many accidents and deaths over the last 40 years we have farmed here. The transportation of Perth's waste to York will further disadvantage York residents and all those using this road, increasing the risk of further fatal accidents. When Great Southern Highway was constructed it was done so for 6 to 8 tonne trucks. The road was never planned to transport 70 tonne road trains. It has few overtaking lanes and is an extremely dangerous road to travel especially when confronted by massive trucks that often travel in the middle of the road over double white lines.

Deadliest roads face scrutiny

PHIL HICKEY

THE worst stretches of highway in the deadliest WA region have been identified in a review aimed at reversing the spiralling rate of regional crashes.

Analysis carried out as part of the Regional Highway Safety Review identified Toodyay Rd, Chidlow York Rd and Great Eastern Hwy as the most crash prone areas in the Wheatbelt.

Police, Office of Road Safety and Main Roads staff will now travel the roads to identify safety measures which can be implemented.

Motorists who use the roads every day will also be asked for their input.

"By literally inspecting these notorious stretches of road together, we anticipate developing a number of initiatives to improve road safety across a range of expert fields," Road Safety Minister Liza Harvey said.

SITA's original figures only suggested 8 hour days, 6days/week operation and with figures changing continuously, it is difficult to know the truth. Add this increase of 5.7% over existing traffic volumes (as stated by Main Roads) plus the normal expected increase in traffic volume of 5.7% . The expected increase in traffic from the closure of the 3 tier rail of 500 trucks a day through York will further increase the dangers. The following is the number of vehicle movements per day that SITA advised to Main Roads

6 truck movements/hr x 11 hrs = 68 movements + 40 light vehicle movements/day

68 + 40 = **108 movements/day** + water carrying trucks.

With the closing of the Northam landfill site in the near future, are we also going to receive waste from Northam, York, Quairading, Cunderdin, Tammin & Kellerberrin and any other waste that would normally go to this site and will this waste be transported through York?

The article (to the left) appeared in the Sunday Times on the 17th May 2015. This is further proof that not only is the Great Eastern Highway dangerous but coupled with the section of the Great Southern Highway that is often called the Chidlow – York Road, between The Lakes and York, is considered to be the most crash prone areas in the Wheatbelt and is the worst stretches of highway in the deadliest WA region. The landfill

KAY DAVIES

proposal cannot be allowed to operate in these areas using these deadly roads, costing the lives of more innocent people.

16. FIRE

This whole area is serviced by volunteer fire fighters made up of farmers and local community members. SITA state "The following types of incidents may require evacuation: Fires, Explosions Gas/Vapours, Bomb Threat." A landfill has a high potential risk of fire causing chemicals and contaminants to enter the air and exposing everything to harmful toxins. They often burn for a very long period and occasionally cause evacuation of areas. The Allawuna property is situated in a very high fire danger position with landfill surrounded by highly flammable crop and bushland and positioned immediately adjacent to Mt. Observation National Park, The Mundaring Weir water catchment area and the 44,000ha Wandoo National Park and is in close proximity to the Wambyn Nature Reserve (215 hectares) and Saint Ronan's Nature Reserve (118 hectares). This is a particularly volatile area in summer months, which with the added potential of fire from landfill and gases produced has the potential to significantly threaten air quality, human and animal life, waterways and the environment as a whole.

SITA's Policy "Staff must protect themselves and others before trying to extinguish a fire. In the circumstances where the Emergency Controller considers that to fight a fire would place employees/themselves at risk, that person must order the company's employees from the area and/or site." SITA recommend to their personnel -pg 15- "Use personal protective clothing or equipment, especially considering the use of a respirator fitted with a vapour filter." Many landfill substances produce toxic fumes when ignited (e.g. plastics, solvents, industrial and medical wastes). Local volunteers have expressed their intentions not to fight fires at the SITA landfill because of harmful toxins and their affects and because they are only equipped with fire protection suits and water, no breathing equipment, foam or CO2. They do not have the resources to fight subterranean fires, which require large amounts of personnel's time to be spent. The statement by SITA, "On arrival, The Volunteer Bush Fire Brigade will take over control of the fire", is not true. SITA have not spoken to the relevant Fire Control Officers and Chiefs, yet they have had ample opportunity to do so over the last 3 years. It is not compulsory for volunteers to attend fires and SITA do not appear to have considered this fact when compiling their contingency plan.

SITA have stated in their latest Fire Management Report that they will have 1 fire fighting present on site. Anyone who has ever been involved in fighting a fire will know that 1 unit is extremely unlikely to be able to extinguish a bush fire and will have no chance extinguishing a large landfill explosion. SITA have truly under estimated the extremely high risk fire danger that exists in the St. Ronan's area and will not be well prepared when this occurs. SITA have now reduced the size of their storm water dam, meaning water storage that could be used to fight a fire on Allawuna will be insufficient.

Allawuna is in an isolated resource area, a long way from other emergency services available in the metro area. It will take an extremely long time to reach the site with the right equipment. Fire is an extreme and real danger, which produces carbon monoxide, dust, smoke, odour and toxins in the air as well as discharging pollutants into water and on to land. Nearby 13 Mile Brook will be threatened by leachate if ponds overflow when water is used to extinguish a fire in or near the landfill, especially as the landfill is positioned on a down ward slope running into the Brook. It is possible the HDPE liner will be destroyed or penetrated by the fire allowing toxic leachate within the landfill to escape into groundwater, 13 Mile Brook and discharge over land leading to serious environmental problems.

Fires are a constant threat all year round in this area. The fire may not even be caused by the landfill itself but by a fire in the forest, a stray bullet, by arson or out of control

"controlled burns", or fire caused by farm machinery working nearby, which could cause the methane and landfill mass to catch on fire. This is a serious environmental concern with no hope of recovery of contaminants and a real threat to neighbouring residents if fire fighters do not attend. I draw your attention to an attached letter from Allawuna's owner Mr Rob Chester and the comments he has made concerning a proposed conservation site on lot 7082 directly joining Allawuna, which shows the level of concern he had concerning fire and native fauna. The conservation site has been rejected due to loss of protected fauna habitat and significant impact to the adjacent Wandoo National Park, pollution of water courses and change in water quality and quantity and due to planning not being consistent with York's Town Planning Scheme.

The latest fire management report discusses burning of the remnant bush land area periodically on a yearly basis (7.1). This was never a part of the original plan and is not an environmentally sound idea. No reason has been given for doing this

During the summer of 2014/15 we have experienced severe hot weather coupled with hot dry strong winds, thunderstorms and extreme lightening events. One of the main causes of bush fires in WA is lightening as was seen with the fires at Northcliffe, Shannon River, Boddington, York and Toodyay during 2014/15 summer season. Forty Nine (49) fires occurred during a 7 day period this summer: <http://www.watoday.com.au/wa-news/bushfire-season-stretches-wafirefighting-resources-20150202-133xrh.html>

Great Southern Highway was closed for several days during 2015 with traffic being diverted due to bushfire. Landfill fires can burn for months on end, spewing out toxic smoke, and has the potential to seriously affect all movement along Great Southern Highway and halting the Agricultural industry in the area and seriously affecting the Wheatbelt, as shown in the link below. The closing of Great Southern Highway will seriously affect businesses in York and the Wheatbelt and have far reaching affects upon our economy.

<http://www.wsocvtv.com/news/news/local/new-warning-health-officials-landfill-still-burns/nkWcx/>

17. METHANE GAS

There is little mention of Methane gases, the control of them and how SITA will stop these entering our environment over the lifetime of the pit. Landfill gas (LFG) is approximately 46% methane, with the remainder being most carbon dioxide, both are greenhouse gas. Methane is considered over 20 times more detrimental to the atmosphere than Carbon Dioxide. LFG also contains varying amounts of contaminants known as non-methane organic compounds. Some inorganic contaminants, such as mercury are also present in the gas of some landfills. There are sometimes also radioactive contaminants, such as tritium, found in LFG. In 1991, the US EPA identified ninety-four non-methane organic compounds, including toxic chemicals like benzene, toluene, chloroform, vinyl chloride, and carbon tetrachloride.

It is possible for LFG to travel underground, accumulate in enclosed structures, and ignite. Gas could be ignited by sparks caused by farm machinery such as harvesters and hay making equipment. Incidences of subsurface migration have caused fires and explosions on both landfill property and private property. LFG is able to travel beyond a landfill although the distance travelled is difficult to predict since it depends on wind speed and direction, temperature, barometric pressure and surrounding soil conditions. Migrating LFG may reach buildings and homes and enter via foundation cracks, floor drain systems and other entry points. Because methane is colourless and odourless it will be impossible for anyone to know if they are having any adverse effects until symptoms begin to show. Exposure to hazardous air pollutants will cause a variety of health problems, such as cancerous illnesses, respiratory irritation, and central nervous system damage. We are

extremely concerned as to the effect any methane will have upon ourselves and our neighbours over time and the stress we will be placed under worrying about these effects.
<http://www.jcu.edu.au/jrtph/vol/v03dunnet.pdf>
<http://www.epa.gov/lmop/faq/public.html>
<http://cranbourne-leader.whereilive.com.au/news/story/settlement-expected-in-cranbourne-methane-estate-class-action/>
<http://www.abc.net.au/environment/articles/2011/07/21/3273887.htm>

18. POWER

SITA mention an energy recovery facility to generate electricity. SITA again have not done their research into this area and our power. Allawuna is on an old power line erected in 1966, it is a single phase line and of very low quality power. The line comes directly from Northam through Muresk directly to our property before making a sharp west ward turn down to Allawuna. We experience frequent power outages and many people that were on the original line that branched back to York have had to be removed, as the power was insufficient for everyone, especially those at the ends of the line, where only a few appliances at one time could be used. Because of this it is extremely unlikely SITA will be able to run a large amount of equipment using this power supply and it will be impossible for them to generate power into this system with the existing line in the condition it is in. There is also concern that over loading the power will cause power outages or low quality power to the SITA site, which will effect the running of the landfill especially the checking of waste by a camera and collection of data. SITA have presented this proposal as having the benefit of creating energy for 3000 homes in York, when this will not be a viable option nor does the power even go to York. SITA have stated on the phone they have not investigated if this is possible or a viable option with Western Power, yet they are happy to write this as a known fact in their submission. Further proof of the power problems associated with the Avon Valley can be seen on page 45, "Towards a Wheatbelt Infrastructure Plan Report 2 – 2011/12", where it states that York's power lines are inadequate and can only accommodate 86 more houses in 2011/12 before it reaches capacity <http://wheatbelt.wa.gov.au/sites/default/files/report/Wheatbelt%20Infrastructure%20Plan%202011-12.pdf> York's power lines are newer and have been well maintained unlike the Muresk line which is not a high priority line.

Methane gases will have to be controlled and burned on the Allawuna site. Greater testing should have been presented on this process for the life of the pit. It is extremely unlikely that Western Power will build a new line as there will not be an increase in homes in the area due to the landfill and shire planning policy, especially as WA uses 15% less power than Western Power is already generating. SITA should have been fully aware of this situation if they had appraised this proposal correctly.

19. DUST

Spring/Summer/Autumn can all produce dry conditions. Excessive winds in this area coupled with continual traffic movement over bare ground and the lack of ground cover around the site as well as the soil used to cover the pit every day, will cause dust emission's to the atmosphere and have the potential to be extreme. Soil in this area becomes powdery when driven over continually in drier months and it takes little wind to blow it into the atmosphere. Couple this with the large willy willies we experience and the dust will cause major concern to the traffic on Great Southern Highway as well as having the potential to cause accidents from poor visibility. Dust especially if they contain leachate particles will have dire consequences and cause contaminates to be spread over water catchment areas, enter waterways, surface water and agricultural properties. This is a matter of great concern. SITA have not shown how they will combat this problem when

weather conditions change rapidly during the day, as they often do here. They have not provided any research into the affects leachate in dust will cause to potable water or contamination of this area or if it is even possible to recover any contamination in this situation.

20. ASBESTOS

With asbestos being accepted at Allawuna, it is of concern that over many years the fibres will become airborne and contaminate land and water. Asbestosis is not dependent on the quantity of dust, a few fibres can be enough to kill. The potential for contamination will be present, even if it is not until the end of the landfills lifetime. The practices used for asbestos storage today are only as good as we know at present, what will occur in the future and if these precautions will remain steadfast are unknown. This area is not contaminated with asbestos at the moment but will be if this proposal is accepted . We do not want to bring a potential life threatening substance into a food producing area that is so close to water catchment, when it is not incumbent to do so. This proposal is against the policies that our government and its agencies are advertising with millions being spent on keeping potable water sources clean and protected.

21. ODOUR

The methods proposed by SITA to measure odour are extremely poor. Experts suggest it is extremely difficult to measure odour and many say it cannot be done. It stands to reason that if the “dynamic olfactometry” is used, It relies on a person’s ability to smell, which then must also be assessed, as everyone can smell at different quantitative levels. SITA’s statement “ODOUR MONITORING AT SITE BOUNDARY: All employees are instructed to report odours to the Allawuna Farm Landfill Manager,” is unrealistic. SITA workers are use to the odour omitted from landfill sites but those of us who are use to clean, fresh air will find the odour extremely offensive and it will affect our quality of life. It is well documented that the odour from landfills is a problem and that it can cause health issues including headaches, nausea, fatigue and respiratory problems. Continual odour can also lead to stress and depression.

Inversion layers can distort the normal movement of particles, just like herbicide spraying has to be adjusted due to temperature inversion and wind. We all open our homes at night to the cool breezes we experience over the spring/summer/autumn months with many of us not having air conditioners. Offensive odours will make this impossible for us to continue to do so and therefore affect our property rights. Working outdoors continuously farmers will be subjected more than anyone to the chemicals and toxins in the air, the continual noise of machinery and the awful stench of landfill odour. This will impact upon everyone in the area and cause further unnecessary stress and detriment to our way of life.

22. WATER

“The Department of Planning have stated that there cannot be any more rural residential subdivisions beyond the scarp unless scheme water is available, however this is not possible”, said Mr Ray Hooper, SEARTG Board Meeting, 11th July 2013. This being the case why is the landfill proposal being considered. The landfill will have a constant population 6 days a week and could be compared to a rural residential subdivision. If water is affected properties do not have any other source of water to use for human and animal consumption placing the health and welfare of everyone and everything in jeopardy. This situation will become extremely stressful to everyone, wondering if we should drink our water and what effects this will have on our health.

Water is often in very short supply, especially if there is little run off or low rainfall. In 2013 we received 494 mm, there was little run off to dams and our dams starting to go dry in December. SITA will require an enormous amount of water if they are going to use it on their roads, vehicle wash down and dust problem areas. SITA have stated they will use water from their storm water dam in their water tankers. The amount of water SITA will need will be greater than the dams capacity, especially when you factor in the use and dam evaporation as the water declines and with their revised plan to make the stormwater dam smaller. SITA do not state what they will do in this situation except that they will not use groundwater sources. With water carting being an extremely expensive option and pressures placed on SITA to maximise profits, they may not have any other option but to use groundwater. As the site is difficult to see it will also be difficult to know if this is occurring.

If groundwater is taken in large quantities it will affect near by national parks, as well as water available to native animals and farming practices. It will seriously affect the environment and further contribute to the demise of native species and degradation to the catchment area.

I do not believe this proposal should be considered unless the Government insures a reliable source of safe drinking water to all residents in the area. If we are expected to endure the contamination that a landfill will cause on our living conditions then ethically and lawfully all residents should be provided with scheme water.

23. GROUNDWATER

SITA have stated on page 8 of their Supplementary Report that there will be at least 2m separation between the liner and the maximum **estimated** winter groundwater table. No evidence has been presented as to where the exact winter groundwater table lays and Golder Associates do not appear to have investigated the groundwater levels over a long enough period to determine this factor above any doubt. Therefore we should be extremely cautious as to the information being presented. In Appendix W Golder Associates accept no responsibility whatsoever for damages resulting from a decision made or actions based on their documents and accept no responsibility for incomplete or inaccurate data.

SITA have included extra data in their revised proposal with many new bore holes being tested in Appendix E1. In Appendix V SITA state "Generally groundwater is not used on Allawuna Farm as it is too saline. Currently there is no proposed future use for groundwater on Allawuna Farm." This statement is incorrect as was the interpretation of information on the salinity of some bore holes. Bores MB03, MB05, MB07 and MB09 all contain fresh potable water with MB03 and MB07 being less saline than potable water delivered to households in the metro area. The greatest percentage of bores contained water that was usable for stock use and this was not represented correctly by SITA and Golder Associates. Attached is a DAFWA upper salinity limits guide and a comparison of salinity and water use produced with bore information given by SITA.

Violent unpredictable storms have become more frequent in this area, during one storm we received 100mm of rain in an hour. This caused extensive damage, dams broke their banks flooding areas, creeks became rivers, fences were swept away and debris was taken kilometres across properties. With the positioning of the landfill cells, water will not only flow from the land above and beside the cells but also from the rain itself during a storm. This will cause leachate ponds to overflow and cause leachate to flow directly into 13 Mile Brook. SITA have not experienced or researched the effects our weather can have upon the environment. We have experienced storms where day has become night from

dust and contaminates in the air. If the pit is uncovered during such an occasion there will be no possible recovery of waste or contaminates. After these storms we have found noxious weeds growing in this area that have not grown here previously and were obviously blown in from many kilometres away. The cost on the environment and waterways from a storm such as these happening at Allawuna will be catastrophic.

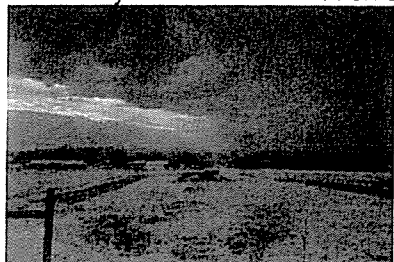


Photo by Lisa Nicole

SITA have stated that in the most severe cases of groundwater contamination, the maximum control of the groundwater aquifer could be instigated, restricting the inflow of the groundwater. Groundwater recharge in this area can occur almost anywhere in the landscape, varying over distances of several metres with large differences in groundwater quality. SITA cannot know with certainty the size or effects that contaminates will have on the aquifers below the pit. When leakage first occurs of a liquid into the soil it is a narrow plume of moisture. This can extend over 5kms or more before the moisture levels extend the width of the plume sideways significantly (20 – 30 meters wide). This is the problem with bore monitoring for leakages. The bores are usually 100m apart so unless the plume heads directly towards one, they usually pass between and extend a long way before being detected. If the leak is at the base, it will extend down beneath the pit undetected. In fractured rock it can enter and travel with operators unaware but even if detected it is impossible to remedy in the fractured rock or repair the leak beneath thousands of tonnes of rubbish

Fractured rock (the granite substrate) traps a lot of water, requires expensive radio mapping to know where the fractures run and their capacities and if they are linked to other aquifers, soaks or bores. Rock also compresses under seismic movement and the water is also compressed and exerts a lot of pressure wherever it can escape rupturing more inflexible materials like clay, rock and liners. SITA have not done enough research into our soil and groundwater and what has been presented leaves little confidence in SITA's ability to present true and precise data.

The Department of Water state- "The aquifer system that is under York is a confined aquifer called Fractured Rock – this means that there is very hard rock – mainly granite under the ground and inside the rock are fractures that contain water. It can be hard drilling to find this water as it is in pockets within the rock as opposed to being in an area like a large swimming pool." With the bores that SITA have used for their research they very possibly have missed pockets of water. York is renowned for its rocky outcrops and differing soil types within a small area. It is likely SITA will have to carry out blasting when they find large rock formations within the landfill site and this will affect ground water and ground structure, as well as buildings on all the surrounding properties, as we have experienced previously when companies have blasted.

SITA state in Appendix V, *"The clayey material on the site is not suitable for use as a clay liner material due to the relatively high permeability and low CEC value"*.

When contacted Qualcon Laboratories who preformed the research in the last proposal presentation, confirmed that if the clay in the pit remains wet, it will stay impermeable, but if allowed to dry out it will crack allowing water and leachate to penetrate. Drying would

also cause the liner to curl and crack. Fissures and joints in the subsurface dramatically increase leachate flow. If this is the case and they should know as they conducted the tests, then our extremely hot dry summers will cause clay to dry and crack and allow leachate into underground aquifers, thus contaminating ground water both in this area and into Mundaring Weir catchment. Cracking and fissures would also place stress on the HDPE liner causing it to crack or tear. Placing a landfill in this area has the potential to contaminate a major potable water source. This is totally unacceptable as hundreds of thousands of people will then be affected. Potable Water is already a scarce and precious commodity in WA with our government and agencies paying hundreds of millions of dollars to provide and keep clean. I draw your attention to the attached letter from Mike Gill B.Eng.Civil. Hons. M.I.E. Aust C.P. Eng who has worked for many years in the York area and who's comments state that this area is unsuitable for landfill due to the Kaolin clays.

Decomposition of organic matter can alter the physico-chemical quality of groundwater and enhance the mobility of hazardous chemicals including metals and solvents. Waste disposal leachate from highly industrialised areas may contain a wide range of anthropogenic contaminants. All of the properties surrounding the site use groundwater to sustain their farming practices. If contaminants enter groundwater all farming practices in the area will have to cease as primary producers cannot sell produce that is contaminated for human consumption. Landfill refuse is rich in micro-organisms and mature sites may be compared to large bioreactors in which the organic content of the waste is decomposed anaerobically. SITA stated in Allawuna Farm Landfill Executive Summary, Nov 2013, that they provide services to all the major metropolitan hospitals, the Crown Casino and are the newly appointed sole waste providers for the Fiona Stanley Hospital. Waste from households, medical practices and hospitals, veterinary practices, industrial sites, tattoo parlours and from environmental sources will contain pathogenic micro-organisms. Healthcare waste can contaminate groundwater through wastes containing infectious pathogens and pharmaceuticals and disinfectants depending on the kinds of medical examination and treatment being conducted and local practices for handling these substances. These can include the following:

- cytostatic agents applied in cancer therapy;
- antibiotics;
- disinfectants for surface, instrument and skin disinfection;
- heavy metals such as platinum from excretion by patients treated with the cytostatic agents, mercury from preservatives, disinfectants, diuretic agents, amalgam separators;
- adsorbable organic halogenes (AOX) from solvents, disinfectants, cleaners and drugs containing chlorine, as well as iodised X-ray contrast media.

Research institutions may also employ solvents, other chemicals and radiochemicals, some of which are very hazardous to human health (e.g. mutagenic substances used in molecular biology). In addition, organisms used in production and/or research, especially pathogenic bacteria and viruses as well as genetically modified organisms are utilised. General household waste can be comprised of disposable nappies, and animal faeces and be extremely high in pathogens. Pathogens may also be transported to landfill sites by vermin (rats) and other scavengers, in particular seagulls. The potential of leachate and run-off from landfill sites to transport pathogens into local water is extremely high. Household waste can also contain many items that should not be placed into landfills such as batteries, paint and chemicals. The bio-security of properties will be destroyed and Western Australians will lose a large food producing area contributing millions to our economy. The fact that Allawuna, a pristine high food producing property will have a landfill area on it that can never be used again as food producing land is criminal. The effects over time that an old landfill site can have upon the environment are well documented, which

means that the groundwater and land surrounding the pit will be forever in danger of contamination. If pathogens enter groundwater what will be the effect of this contamination on the catchment area and the Mundaring Weir water source, which supplies potable water to thousands of households?

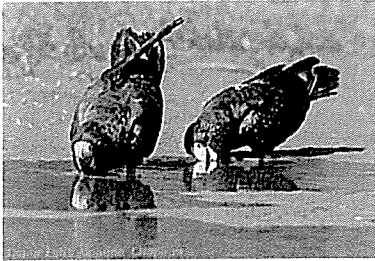
www.hpa.org.uk/webc/hpawebfile/hpaweb_c/1309969974126

The disposal of waste into landfill does cause pollution, contamination of the environment and risks to human health. Landfills in Australia and all over the world leak, with SITA's landfills at Cardup, Cranbourne and Cornwall to name a few. SITA have failed to show the need for this proposal, stating to the Shire of York that there is air space still available until 2050 in existing landfills. This landfill will pollute and contaminate our air with chemicals, dust, noise and odour and cause emissions and contamination to the water and land, it also has the potential to contaminate potable drinking water, during the landfills life and for hundreds of years thereafter. This is unacceptable to us.

SITA state that studies conducted on HDPE liners indicated a life span from 20 years to infinity. This being the case, if the liner only last 20 to 60 years due to manufacturing defects, ripping on transportation or poor installation, which is possible the landfill may well still be in use when this occurs and there will be little hope of recovering leachate from the environment and perhaps causing cells above to become unstable. HDPE liners allow dilute solutions of organic solvents (for household use) to pass through an intact liner (many carcinogenics are readily transported through groundwater systems). A single composite liner can start to deteriorate from 4 years and fail to prevent ground water pollution. (Lee & Jones-Lee, 2013) due to polymer breakdown (Hsuan and Koerner (1995), manufacturing imperfections (UV deterioration), stress, cracking and punctures. Bruce Bowman on 19/11/2012 at SITA's first presentation in York, stated that the liner SITA were using, could as part of its' engineering properties, be easily punctured by waste if there was sharp or metal objects present in the first tip of waste onto the liner and that SITA cannot guarantee that the first tip would not tear the liner. In a time when worldwide food is becoming short and there are better uses and technologies available for waste it seems archaic for SITA to be proposing a landfill in such a pristine and important area.

24. FAUNA

SITA have provided only minimal research into the flora and fauna with investigation only carried out in a short period and not over an entire year to show true diversity and breeding seasons. As SITA has been considering the Allawuna site since 2012, a period of over 3 years it is disappointing to note that they have not performed any additional research but are once again presenting original incomplete data. SITA have not provided any information on seagulls that are not present in this area yet but will be attracted to the landfill, as they have been in Northam and at all landfill sites. Seagulls will cause contamination and transmit diseases. SITA have not researched the affects of birds becoming contaminated at the site and then transferring leachate contamination to rooves, waterways, dams and stock troughs. Birds land daily on troughs and in dams to drink, leachates will be transmitted from the birds to these water sources. This will affect surrounding farms bio-security and cause serious contamination to the food chain. We are extremely concerned as we will not be able to prevent this from occurring and we will not be able to use our water, once it is contaminated.



SITA have not researched the wild pig population, which the Allawuna owners have had extreme problems with. Wild Pigs will affect the sites security, burrowing under the fence as well as contaminating the surrounding area. SITA appear to have rushed their research and have not provided sufficient data on this proposal. No major research has been conducted on the Carnaby Cockatoo's and how the proposal could contribute to their further endangerment and extinction. No research was offered on how the landfill will affect any of the species that already exist in the area, with a wide diverse mixture of variants.

25. SEISMIC

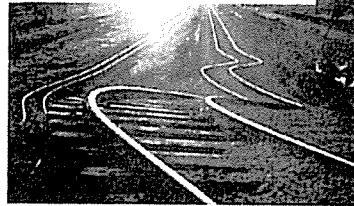
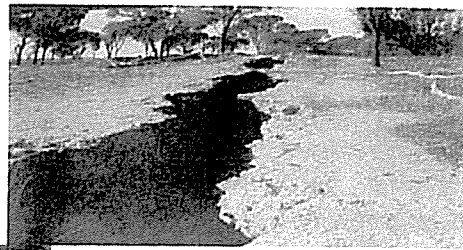
In Appendix V, SITA state *"There is no record of any earthquakes within 4 km of the Site boundary, with the nearest being a magnitude 2.5 earthquake 4 km to the north-east of the site"*

Sites within York and the surrounding localities are subject to Seismic Activity. This ranges from minor tremors that can't be felt to earthquakes that can have the potential to cause structural damage. In this regard, buildings are required by the Building Code of Australia to comply with the following standard: AS 1170.4-2007 Structural design actions - Earthquake actions in Australia. Certification of compliance with this standard, by a Practising Structural Engineer, will be required for most buildings that comply with the Australian Standard A.S./NZS 1170.2-2011 Wind Actions.
<http://www.york.wa.gov.au/earthquake-seismic-activity-design.aspx>

York lies within the South West Seismic Zone (SWSZ), the largest of the Australian active zones and known internationally as the most unpredictable. There has been continuous movement in this zone – since 1968 with 9 earthquakes above magnitude 5 along this fault line. Geo Science has predicted that York is one of the top 4 hot spots in Australia that will experience an earthquake and predict a magnitude of 7.1. Earthquakes potentially change surface and underground water courses and are known to tear landfill liners at magnitude 5.
<http://www.perthnow.com.au/news/national/australias-earthquake-hot-spots-revealed/story-fndo6ejf-1226519537825>

The HDPE liners proposed at Allawuna is one such liner. The Meckering earthquake seriously affected the structure of buildings in Perth a distance of 133 km away. SITA statement that there has been no earthquake within 4 km of the site is a seriously misleading statement, as a distance of 4 km is insignificant when looking at the effects of an earthquake on land and structures.

The below images showing the effects of the Meckering earthquake:



As the site sits above an aquifer, there is potential for liquefaction & collapse of the pit in the event of an earthquake. Seismic activity creates pressure changes and creates unpredictability as it can change the rock fracture pattern by adding new ones and closing old ones, thus altering the aquifers shape and direction. The risk of earthquake is always present and so too the risk of pit compromise, liner failure & environmental disaster with discharge to land and water. Leachate will spill from sump, evaporation ponds or damaged transfer pipes to soil or surface water with no hope of recovery. Earthquakes will fracture clay liners and are an extremely real threat in York. Councillors also need to insist that should this proposal be accepted then a **permeable reactive barrier** must be used at the Alluwuna landfill site if our environment is to have any chance of protection against leakage.

In the Wheatbelt the groundwater varies considerably from site to site and has not been extensively mapped, as Adrian Peck stated (CSIRO Team leader of Geohydrologists who studied the area) "Groundwater recharge in these areas is poorly understood by many. It can occur almost anywhere in the landscape, and vary over distances of only a few 10s of metres. Consequently there can be large differences in groundwater quality over short distances."

Therefore we do not know the pattern of groundwater accurately enough without very extensive mapping of the site to be sure contamination is localised and not travelling elsewhere. Due to the constant seismic activity of Zone 1 (the most active and unpredictable Australian seismic zone SWSZ) the ground fracturing is constantly altering the underlying rock and clay fractures and changing the potential course of pollutants. There is no safety in this type of landscape and industries that have the potential to cause groundwater pollution should not be permitted in the Darling Ranges or Wheatbelt within Zone 1.

26. INDEMNITY INSURANCE

Authorities needs to be very aware of the indemnity insurance that will be required for this proposal as well as legal actions that will be taken by residents in the area for the decrease in land values and if any environmental contamination occurs, as has happened in countless other shires in Australia. SITA have not provided any information on compensation to the Shire of York or community members if contamination occurs. Countless landfills across the world cause enormous environmental issues and the ratepayers of York need to be protected from compensation claims that will occur if this proposal is allowed to continue.

Refer to Shire of York Town Planning Scheme Compensation Page 51.

Below is a small sample of SITA leakages.

<http://cranbourne-leader.whereilive.com.au/news/story/settlement-expected-in-cranbourne-methane-estate-class-action/>

"This is a significant case for environmental law in Australia. This successful settlement sends a message to all councils and authorities managing environmentally sensitive sites that it is critical to properly address the risks such as landfill gas migration, and to do it prudently," Mr Hardwick said.

<http://www.abc.net.au/environment/articles/2011/07/21/3273887.htm>

<http://www.thisiscornwall.co.uk/Water-polluted-landfill-leachate-leak/story-17892435-detail/story.html#axzz2je1ZSXUt>

27. EMPLOYMENT

During the past three years, SITA have continually changed the number of people expected to be employed at Allawuna but have continually said that it will benefit employment for the York community. Allawuna is located 40 minutes from Midland, 25 minutes from Mundaring and it is not far to travel to Wundowie or Bakers Hill. There is no guarantee that employment opportunities will benefit York businesses with Allawuna being positioned so closely to the metro area.

I believe this proposal will not bring any significant benefit to the York community but has the potential to destroy much of our existing employment opportunities. Tourism and the Hospitality Industry are major and vital sources of income to York and affect most of the retail sector of Avon Terrace, including restaurants, the York Co-op, local B & B's, hotels, fuel stations, our many real estate agents and novelty stores. From research conducted there will be a major downturn in tourism to York from the unwillingness by many to travel Great Southern Highway behind stinking waste trucks, along a road that is already considered to be one of the extremely dangerous roads in the Wheatbelt. With SITA stating that their business hours will include all day every Saturday, major events held in York will be seriously affected.

I am aware that SITA have already asked many businesses for quotes and tenders for work to be done on Allawuna and that many companies that have been approached are not situated in or even near York and the Avon Valley. I believe we are being seriously misled by SITA's statements that this proposal will benefit York. SITA already have signed contracts with employees and contractors at their Cardup landfill and these will be continued no matter where the landfill is positioned. A spokesman from Avon Waste stated that they have not agreed to manage the landfill site nor does Avon Waste own trucks large enough to transport waste from Perth to York. Avon Waste already employs local staff to transport local and Wheatbelt waste. There are no other local waste companies in the Avon Valley.

Local honey producers McNamara honey have always placed Bee hives in this area. This is of great benefit to the environment and employment, but the proposal has the potential to destroy this local business as bees can not be positioned near a landfill. There is also an organic Olive Farm close to the proposal that could have its' certification removed if contamination occurs, so that organic olives and olive oil could no longer be produced organically. The same can also be said for our own bio-dynamic property and the produce we now market as chemical free. These are only a few examples of how this proposal will serve to destroy many local businesses and local employment.

28. PRECAUTIONARY PRINCIPLE

I believe the Precautionary Principal should be used as this proposal has the potential to risk and cause harm to the public and the environment. There is a lack of extensive and

conclusive scientific knowledge with this proposal having consequences that are uncertain and potentially dangerous especially to our environment and the health of community members living in close proximity to the landfill.

The Allawuna landfill will contaminate an environmentally sound agricultural area that has a high value in land production, which contains a Soil Conservation Covenant, positioned adjacent to Mundaring water catchment area and important sensitive National Forest. The land is pristine and clean and we should not be allowing it to become contaminated and destroyed for future generations.

29. IN CONCLUSION

SITA have continued to change and misrepresent information provided on this proposal since 2012 and I feel will continue to change data provided in an attempt to confuse the public and government departments. SITA has been considering the Allawuna site since 2012, a period of over 3 years and it is unacceptable that they have not preformed any additional research into many of their assessment reports, but are once again presenting original incomplete data. In Appendix W Golder Associates accept no responsibility whatsoever for damages resulting from a decision made or actions based on their documents and accept no responsibility for incomplete or inaccurate data. I believe we cannot be confident that any information that has been presented is correct and I feel we should question much of the data that has been presented.

The presentation of a proposal for a landfill that now covers only a small proportion of the future intended landfill proposal is both misleading and poor planning, as it does not provide us with the full version of what is intended. We are being asking to make a decision on a limited view of the entire future planned landfill without all the appropriate information.

SITA is a foreign owned company making its profits from the waste generated by Perth's metro area. SITA should be forced to operate their waste management company with the best outcome and interests for West Australians. We should not be just considering this proposal because it is the best position for SITA and will provide SITA with the greatest profitable outcome.

There is an enormous public concern over this proposal and the affect it will have upon the environment and future generations. We cannot ethically approve a proposal that has the potential to destroy a large percentage of our Agricultural and Tourist Industries and change our historical standing. With so much opposition by the residents of York it is unfathomable why this proposal is being considered and forced on a community that is so opposed to it, especially when there are communities further out in the Wheatbelt who welcome the idea of a landfill in their shire and would be ecstatic to accept this proposal. These shires are more arid and would be better suited to a landfill. Here further recycling could occur and waste turned into fertiliser and power.

I believe this proposal will not bring any significant benefit to the York community but has the potential to destroy much of our existing employment opportunities and high capacity Agricultural land

Councilors for the Shire of York voted on the 14th April 2014 at an Ordinary Council Meeting to: ***“Request the Minister for Planning to make waste management facilities a prohibited use in the Shire of York Town Planning Scheme No. 2.” This was***

carried: 6/0. This was an important vote by our councilors and further proves why the Allawuna landfill proposal should not be accepted by the JDAP.

As ratepayers and community members I believe we have the most momentous right to decide the future of York, as our knowledge and future interest of this area far out weights that of any governing body. The huge outcry that the York community has made in rejecting this proposal should be more than sufficient to have the SITA landfill proposal rejected.

I thank you for the opportunity to make a submission to the Shire of York.

Yours sincerely,

Kay Davies

YORK WA 6302

ATTACHED DOCUMENTS

Letter from Mike Gill
Letter from Minister John Day
Allawuna Dry Grazing Map provided by DAFWA
Allawuna Dry Cropping Map provided by DAFWA
Allawuna Vines Capability Map provided by DAFWA
Allawuna Perennial Horticulture Map provided by DAFWA
Allawuna Annual Horticulture Map provided by DAFWA
SITA Bore Salinity showing possible use of bore water
DAFWA approximate upper salinity use sheet

OTHER REFERENCES USED

www.dec.wa.gov.au/.../5177-determining-whether-a-works-approval-is-r...

www.who.int/water_sanitation_health/.../en/groundwater12.pdf

5101 Bannister pdf

Allawuna Landfill Proposal - works approval application 2013

Allawuna Farm Landfill Executive Summary – November 2013

York Town Planning Scheme No. 2

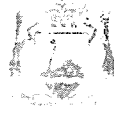
State Planning Policy 2.5 - Land Use Planning in Rural Areas

SITA Works Approval Documents 2015

SITA Executive Summary

Allawuna Landfill Facility Supplementary Report

<http://academic.evergreen.edu/g/grossmaz/WORMKA/>



Minister for Planning; Culture & the Arts
Government of Western Australia

15 NOV 2013

Our Ref: 33-22845

Ms Mia Davies MLA
Member for Central Wheatbelt
PO Box 92
NORTHAM WA 6401

Dear Ms Davies *Mia*

PROPOSED SITA LANDFILL SITE AT ALLAWUNA IN YORK

Thank you for your email of 25 September 2013 regarding the proposed Allawuna landfill site at 2556 Great Southern Highway, York. I am aware of community concern regarding the proposal and have responded to a number of queries on this matter.

At this point, no planning application has been made for the landfill site. However, I am currently considering Amendment 50 to the Shire of York's scheme, which could assist decision making should an application be lodged, as this may introduce definitions for waste management sites, as well as other application requirements. The Shire's scheme is currently silent on the matter of landfills which could complicate decision-making if an application were lodged prior to the scheme being amended.

Due to the construction cost of the landfill site, it is likely to meet the threshold that would require determination by the Wheatbelt's Development Assessment Panel (DAP). As Minister for Planning, I have no decision-making role in DAP processes.

As you may be aware, there are also 35 pending appeals made against the level of environmental assessment set by the Environmental Protection Authority (EPA). No formal assessment was set, and the Office of the Appeals Convenor is currently investigating appeals lodged on this basis. The Appeals Convenor will make a recommendation to the Minister for Environment on this matter.

I share your views regarding greater co-ordination of landfill sites, and I understand the Department of Environmental Regulation is progressing work regarding site selection criteria on behalf of the WA Waste Authority.

As a planning response, the Western Australian Planning Commission has recently endorsed a Wheatbelt Regional Planning and Infrastructure Framework (the Framework) for public comment, which I expect to present to Cabinet shortly.

The Framework recommends that waste management sites be determined by scheme amendment processes, which require early referral to the EPA and public advertising. Subject to environmental and land use suitability, landfill sites should be adjacent to the region's major transport routes - the Great Eastern, Great Northern and Brand Highways. The Great Southern Highway, though technically a main road, may not be configured to handle the type of vehicles proposed, nor be an ideal entry point to WA's first inland town of York.

This approach acknowledges that identification of proposed landfill sites that are linked to metropolitan transfer and recycling stations meet a range of operational, logistic and business considerations. Until the WA Waste Authority has established site selection criteria, planning instruments such as the Wheatbelt Regional Planning and Infrastructure Framework can set broad parameters for sites, with a decision-making framework reflective of community expectation.

I hope this provides an update to the Allawuna proposal and my office would be happy to provide briefings as it progresses.

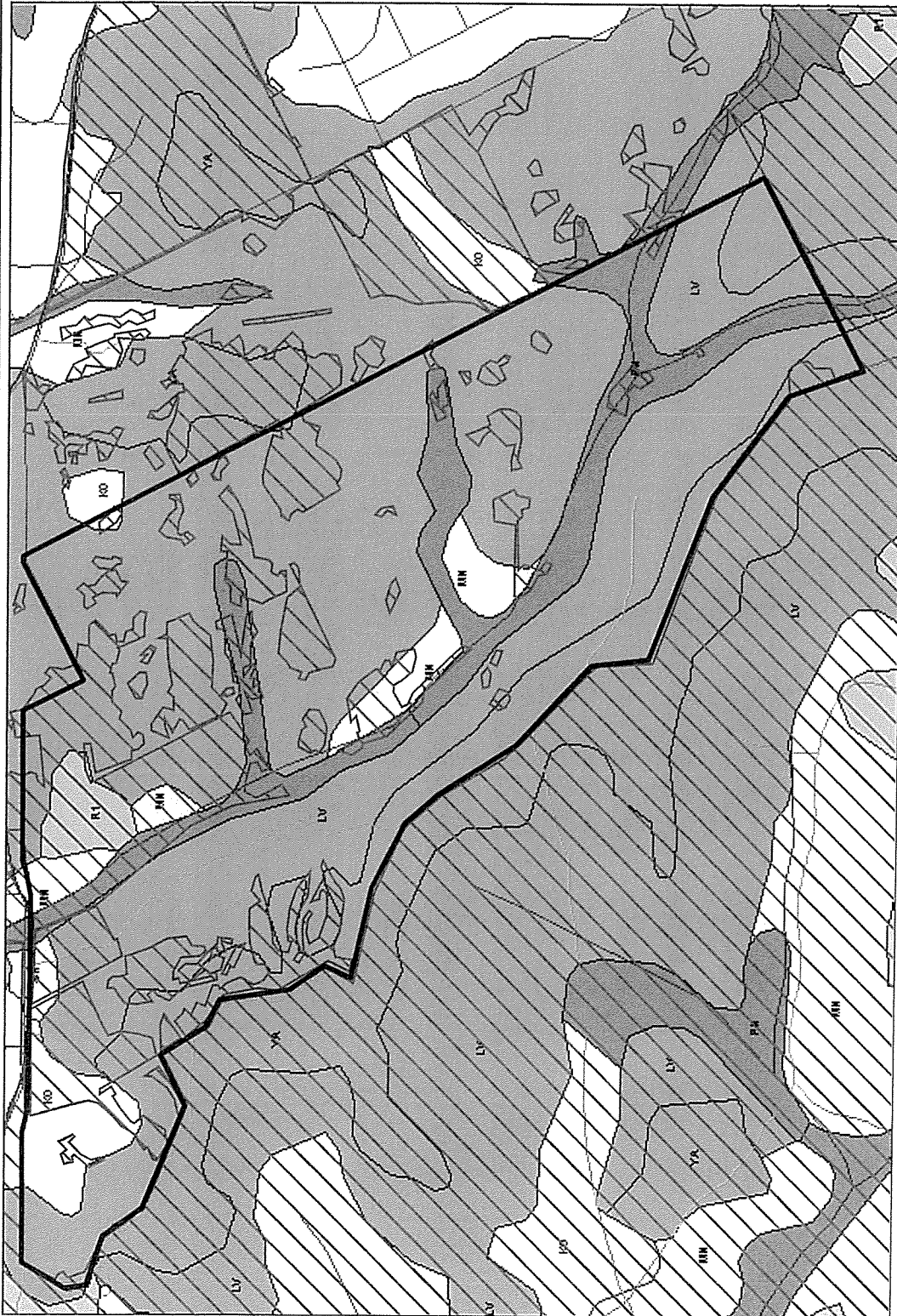
Yours sincerely

A handwritten signature in dark ink, appearing to read 'John Day'.

**JOHN DAY
MINISTER FOR PLANNING;
CULTURE AND THE ARTS**

13 NOV 2015

Perennial Horticulture



LEGEND

Cities and Towns

- A Major town names
- A Towns names
- All cities and towns

Hydrology

- ~ Hydrology

Roads - Detailed

- ~ Freeway
- ~ Highway
- ~ Primary
- ~ Secondary
- ~ Minor
- ~ Track
- ~ Connector
- ~ Proposed

Vegetation

- ~ Remnant vegetation

Properties

- ~ Subsystems

Subsystems

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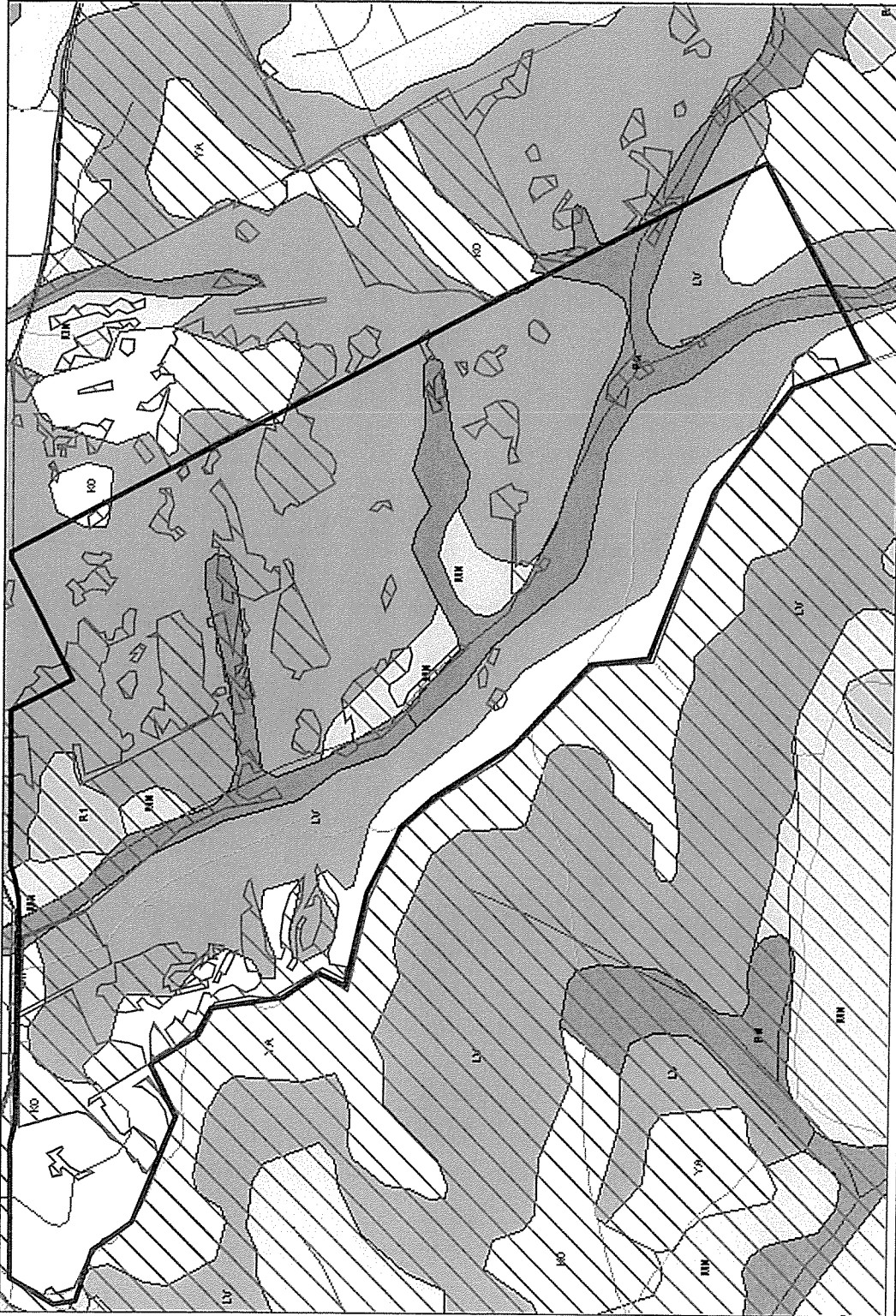
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Annual Horticulture



LEGEND

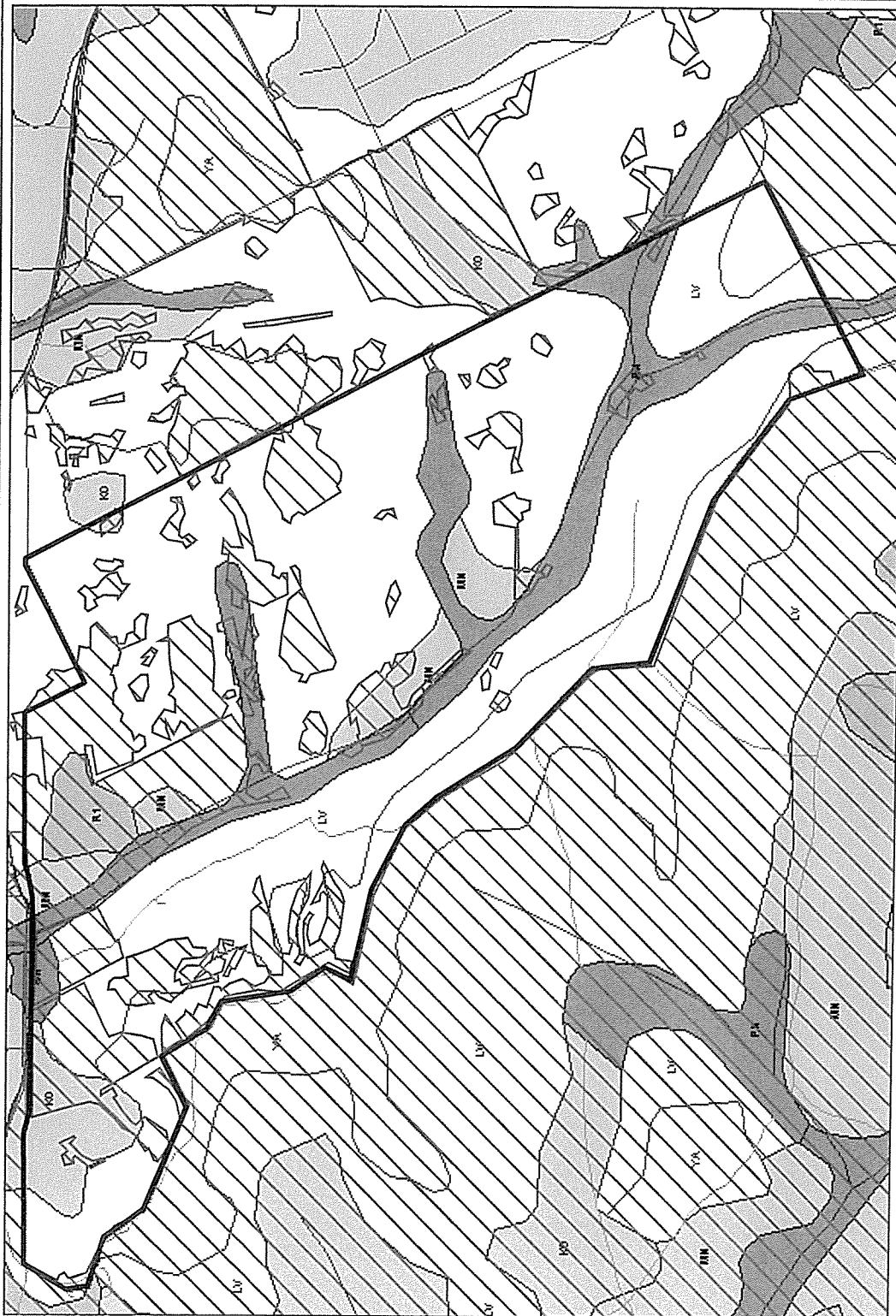
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- Hydrology**
- Hydrology
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- Vegetation**
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 - Insufficient information

Produced By: 159.207.60.128 Date Produced: 3/26/2014



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Dryland cropping



LEGEND

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 - All cities and towns
- Hydrology**
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 - Connector
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- Vegetation**
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 - >70% of Land has low capability
 - Insufficient information

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1 km



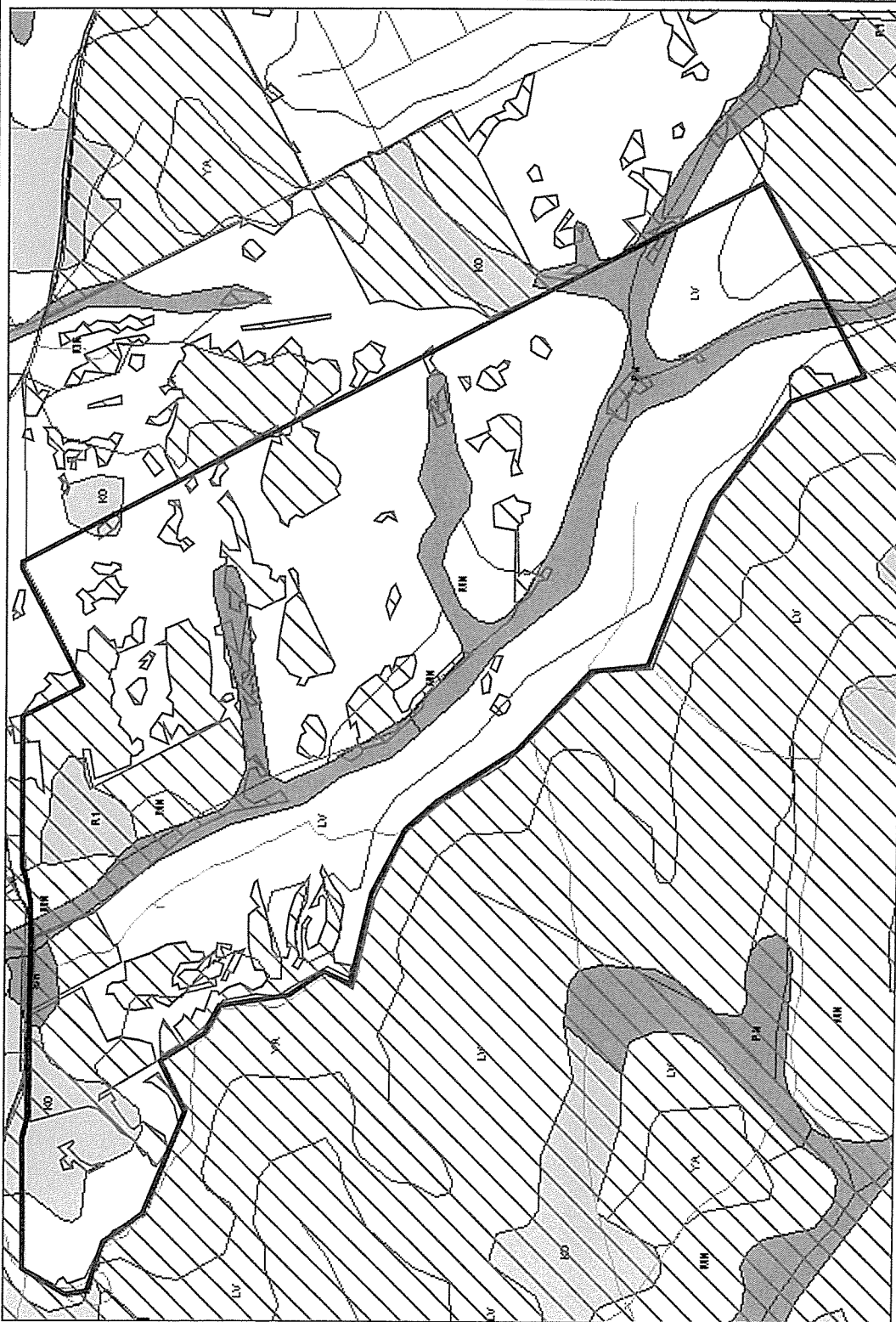
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Department of
Agriculture and Food



Grazing



LEGEND

- Cities and Towns**
- A Major town names
 - A Towns names
 - All cities and towns
- Hydrology**
- Hydrology
 - Roads - Detailed
 - Freeway
 - Highway
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 - Connector
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- Vegetation**
- Remnant vegetation
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- Subsystem/phase label arrow
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- >70% of Land has high capability
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 - 50-70% of Land has low capability
 - >70% of Land has low capability
 - Insufficient information



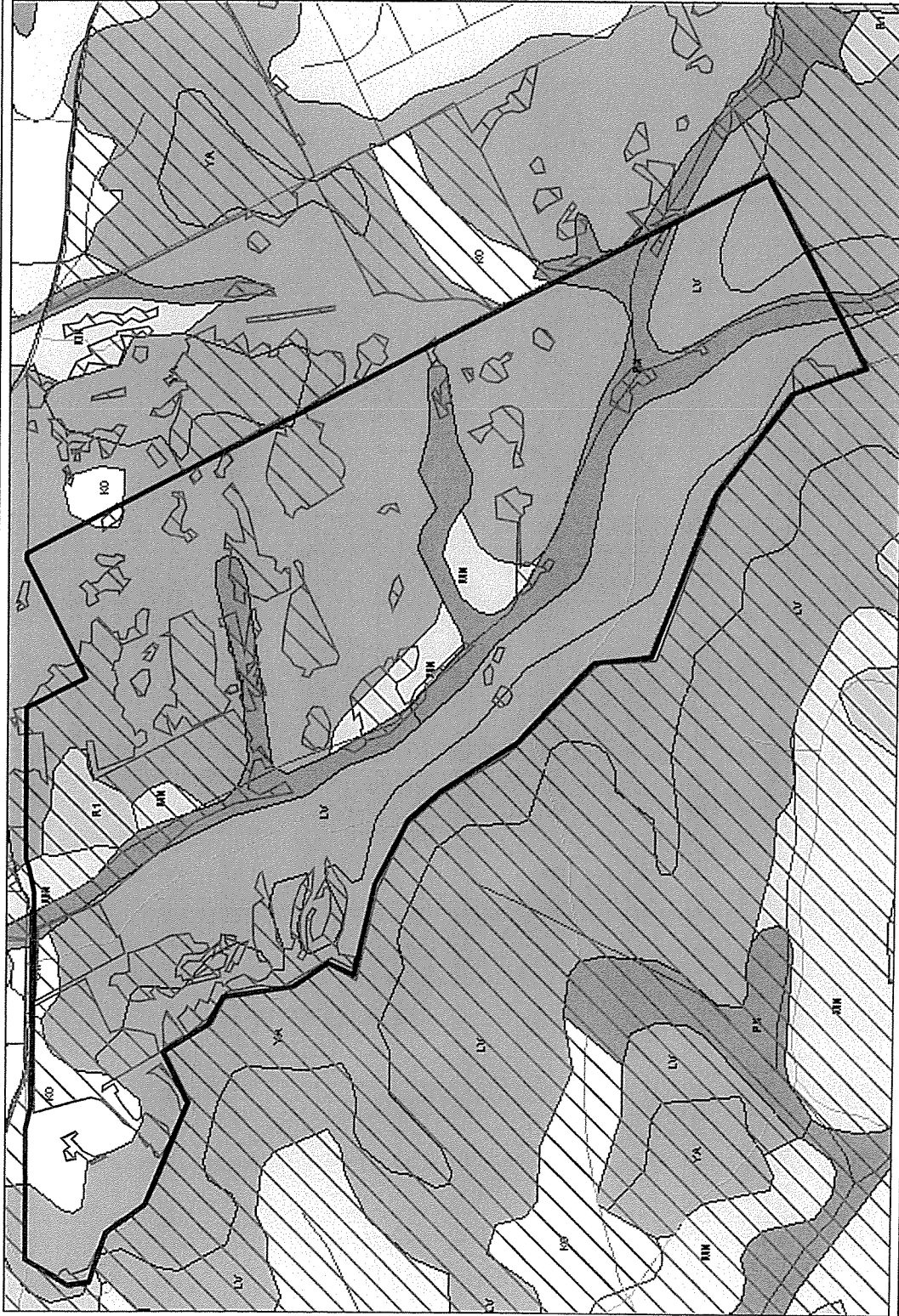
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Vines



LEGEND

- Cities and Towns**
- A Major town names
 - A Towns names
 - All cities and towns
- Hydrology**
- Hydrology
- Roads - Detailed**
- Freeway
 - Highway
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Produced By: 159,207,60,128 Date Produced: 3/26/2014



Approximate upper salinity limits for the use of water for animals, domestic use and irrigation

EC 25°C mS/m	EC 25°C mS/m	Water Group	Precautions for irrigation use (*see important footnote)	Suggested Plants **	
				A	B
100	100	A	0.80 mS/m Highly salt- sensitive plants	1. Avoid wetting leaves on hot dry days.	Pastures --- Ladino clover, Red clover, Alsike clover, White clover. Fruit --- Strawberry, raspberry, avocado, loquat, stonefruit, citrus fruit, apples, pears. Vegetables --- Green beans, parsnips, celery, radish, squash, peas, onion, carrot. Ornamentals --- Primula, gardenia, star jasmine, begonia, rose, azalea, camellia, ivy, magnolia, luchsia.
200	200	B	80-230 mS/m Mildly salt- sensitive plants	1. Avoid wetting leaves during the day time. 2. Avoid light frequent waterings. 3. Water quickly and use continuous wetting sprinklers if wetting the leaves	Pastures and Crops --- Strawberry clover, maize, lovegrass, cocksfoot, oats, wheat, rye, lucerne. Fruit --- Mulberry, grape. Vegetables --- Cucumber, capsicum, lettuce, sweet corn, rock melon, potatoes, cauliflower, cabbage, watermelon, broccoli, pumpkin, tomato. Ornamentals --- Hibiscus, geranium, gladiolus, zinnia, poinsettia, lantana, Thuja orientalis, Dobernea, banana, Juniperus chinensis, Callistemon.
300	300	C	230-550 mS/m Slightly salt- sensitive plants	1. Avoid wetting leaves of most plants where possible. 2. Adequate leaching necessary.	Pastures --- Paspalum dilatatum, Birdsfoot Trefoil, Phalaris, Sudan grass, Perennial ryegrass, Millot, Wimmera ryegrass, barley, Pangola grass. Tall fescue, Rhodes grass, Kikuyu, Couch grass, Tall wheat grass Fruit --- Olive, fig, pomegranate. Vegetables --- Spinach, asparagus, kale, garden beets Ornamentals --- Stock, chrysanthemum, carnation, dandelion, rosemary, bougainvillea, vinca, coprosma, Japanese pepper, Ficus spp. in general, false acacia, Queensland pyramid tree, N.Z. Christmas Bush, Eucalyptus botryoides, Eucalyptus laevis, Eucalyptus tereticornis, Buffal grass, Kikuyu grass, Portulacca, mesembryanthemum, boobyalla, morfel, swamp yate, York Gum, swamp melilot, couch grass, bamboo, Kondinin blackbutt, Actinostrobus pyramidalis.
400	400	D	550-2,000 mS/m Salt-tolerant plants	1. Do not wet leaves where possible. 2. Excellent drainage and leaching necessary.	Pastures --- Saltwater couch (P. vaginatum), Puccinellia, sand couch (Sporobolus virginicus). Fruit --- Date palm Ornamentals --- Phoenix canariensis, salt river gum (E. Sargentii), saltwater couch (Lawn), Melaleuca thyoides, salt sheoaks, (Casuarina cristata and C. glauca), tamarisks, saltbushes.
500	500	E	More than 2,000 mS/m	Too salty for irrigation	

Results of water analysis for salinity are quoted in millisiemens per metre (mS/m) at 25°C. mS/m is a unit of electrical conductivity (EC).
To convert values in (mS/m) to an approx. mass/ volume of TSS (TOTAL SOLUBLE SALTS) refer to the following ratios.
mS/m x 5.5 = mg/L TSS.
mS/m x 0.385 = g/g TSS.

ALLAWUNA BORE INFORMATION

<u>BORES</u>	<u>Mg/L</u>	<u>Ms/m</u>	<u>USE</u>
MB O1	21 000	1 300	Sheep & Cattle
MB O3	1 300	236	Humans, Animals & Crops
MB 04	9 300	1 691	Sheep
MB 05	3 000	550	Poultry, sheep, cattle, horses, pigs, crops
MB 06	12 000	2 180	Sheep
MB 07	1 200	220	Humans, Animals, Crops
MB 08	14 000	2 550	
MB 09	2 300	420	Poultry, sheep, cattle, horses, pigs, crops
MB 10	11 000	3 090	
MB 11	12 000	2 180	Sheep
MB 12	8 100	1 470	Sheep & Cattle
MB13	13 000	2 360	
MB 14	18 000	3 270	

$$\text{Ms/m} = \frac{\text{mg/L}}{5.5}$$

DAFWA information on upper salinity limits for the use of water for animals, domestic use and irrigation have been used.

AVON CIVIL ENGINEERING

15 May 2013

Colin Cable
Talbot Brook Land Management Associated Inc

To whom it may concern

Re : Penetration of Ground Water in Kaolin Clays.

Further to our recent discussion regarding potential penetration of Kaolin based soils in the Avon Region.

It is my opinion that the kaolin ground conditions encountered in the Avon Valley are susceptible to penetration by ground waters. The region is an active seismic zone combined with long periods of dry, leads to the formation of a complex network of fault lines and fissures which when encountered by moving ground water will open up and allow transmission of moisture.

Thus in the event of a moisture leak from a potential waste management site there would most surely be contamination of the regional ground water basins, including the Avon and Mundaring catchments which are sources of drinking water for our growing population.

The risk that the proposed liners of the land fill site may rupture or decay with time are significant and far outweighs the benefits of accepting this proposal.

In my opinion fundamental physics precludes establishing any large waste management facility in a seismic region adjacent to significant ground and surface water resources.

Regards

Mike Gill

Mike Gill
B. Eng Civil. Hons.
M.I.E. Aust. C.P. Eng

Records

From: Mirabilis
Sent: Monday, 25 May 2015 2:54 PM
To: Records
Subject: 1147866 - Fwd: SITA Landfill proposal on Allawuna Farm York WA Ref No : 5830

SynergySoft: 1147866

262

SHIRE OF YORK	
FILE	PS GEN-PP. 3-1
OFFICER	INITIALS
K. RA	(Signature)
25 MAY 2015	
REFERRED TO COUNCIL	
DATE	INITIALS

24 May 2015

M & P Wilson

email: _____

RECORDS
SHIRE OF YORK (WA).

PUBLIC CONSULTATION:

RE: OBJECTION TO SITA LANDFILL PROPOSAL ON ALLAWUNA FARM, YORK, WA.

Dear officer in charge,

We strongly object to the proposed land use by SITA on the Allawuna Farm, York, WA.

We live close to Gt Eastern Highway, in Mundaring Town Centre, and have family with a farm in the York shire. This SITA proposal is an appalling idea.

REASONS FOR OBJECTION:

1) There is no evidence to show why a landfill site is required on prime agricultural land, in the Avon Valley. There is no policy which says prime agricultural land can be used for this purpose.

2) No cost/benefit analyses have been shown.

3) No waste management plan in Perth:

WA is in dire need of legislative reform on waste management. A waste management strategy needs to be in place and recycling infrastructure. The viability of end markets for recovered resources needs to be raised. Municipal recovery rate is low in WA; ACT is highest at 59%. (2008 - 2009). WA has the greatest waste generation (2665 kilograms/person) in Australia. Tasmania the least at 1057 kilograms/person. (*Australia State of the Environment 2011, page 818*) In the absence of adequate legislation and a deficient and defective waste management program in WA, this SITA proposal should not be

considered.

4) Consistency needed in EPA and DEC:

The EPA and DEC lack faith in current cell containment designs for the metropolitan area, yet deem them suitable for the Avon Valley. This is a serious contradiction. The importance, the relevance of the Avon Valley to the broader metropolitan area cannot be understated.

5) Contamination issues associated with landfills are significant. It is unacceptable to propose that the Perth metropolitan area offload its rubbish and contamination problems on prime agricultural land in country areas such as the Avon Valley, and add to already high environmental and social impacts of heavy transport problems in the Hills.

6) There are better options that should be used:

Sound options would be anaerobic digestion, composting, waste energy produced from a gasification plant (biogas). The Redhill rubbish tip has successfully captured methane for many years). 'Improved technology successfully diverted tens of millions of tonnes of solid waste from landfill into productive uses'. This saved large quantities of valuable materials and significant amounts of embodied energy and water'. (*Australia State of the Environment 2011*, page 57).

This location is totally inappropriate for landfill. It has been realized for some time that many contaminants cannot be safely disposed of in this manner. There are significant groundwater issues. Mundaring and Helena Catchments would be placed at considerable risk. We have no faith in the EPA. Waste technology has been evolving fast, it is well advanced.

7) Water quality issues at the proposed landfill site:

*Potential impacts of the landfill and leakage of contamination into increasingly scarce water resources remain to be fully addressed. We are not satisfied that this has been done.

*Any pollution of surface and groundwater resources would lead to contamination of York's protected water catchment areas. Even with the use of Bunding (impervious material), there is still going to be leakage. (Eg as happens with petrol stations). This is totally unacceptable, especially in such a sensitive area.

*Allawuna Farm is too close to the Helena River Catchment boundary.

*Mundaring and environs, the 'wheatbelt' and the 'Goldfields' all rely on the Helena River Catchment for their only source of drinking water.

*A landfill so close to our only water catchment is grossly irresponsible.

*Even the slightest possibility of contamination is unacceptable. can pose serious threats to human health.

*As the proposed land use site is higher than the catchment, any breach of containment would gravitate pollutants into the Helena River.

8) Potential reduced safe water availability:

Contamination would lead to adverse impacts on safe water availability at a time of increasing population and a dryer climate.

9) Cost of remediation (COR):

Clean up costs are estimated to be 2 billion / year, with total remediation costs much higher. If water quality standards set by WHO could not be met, WA would not meet pollution targets set for the next 6 years. (*Australia State of the Environment 2011*. Prevention is better than cure:

10) Climate Change issues:

In view of our drying climate in the South West, precious water resources of the Avon Valley must be protected at all costs. This landfill proposal would seriously threaten the high quality of present water resources. This is totally unacceptable.

The projected increase in intensity of extreme weather events such as flooding would have adverse implications for efforts to

control and reduce contamination. Flooding can introduce contaminants and diseases into healthy water supplies, and spread contamination from the landfill site.

11) Toxic dust issues:

*York's high winds and regular flash flooding would transfer toxic dust from the site via 13 Mile Brook into the Avon – Swan Catchment and potentially into the Mundaring and Helena Catchments.

*Disease would spread to native fauna. Such risks are totally unacceptable.

*Should the tipped material ignite, ash and smoke would be wind borne and could settle in the catchment area. The liner would most likely be damaged or ruined.

*The leachate ponds seem to be susceptible to ground water flooding. A mix of leachate and flood water would travel downhill to the catchment area.

Should the leachate ponds dry out, the contaminated dust could be wind driven towards the catchment area.

12) As the tip life is currently 20 years, and the first SITA proposal said 40 years, the chance of a catastrophic event is quite likely.

13) Cumulative impacts would be major / significant:

* The current proposal to clear 25 acres of Wilkins Rd Reserve in Kalamunda would also impact on Priority 1 Helena drinking water catchment..

* Damages to systems can lead to substantial indirect impacts. Impacts may be triggered that reach far beyond the particular location where the damage has been done.

*Road trains / trucks - increased traffic, unmitigated, will lead to increased air pollution in residential areas.

SITA's Nial Stock in the Hills Gazette 22/05/2015 ('Impact will be minimal') wrote of SITA trucks only on Gt Southern Highway. Regular passage of BGC and interstate road trains along

Gt Eastern Hwy through Mundaring is already causing significant / major impacts. The combined impact would be even greater in terms of pollution, dust, noise, vibration, safety issues.

This is totally unacceptable.

*wheat trucks will bring additional impacts, following closure of the tier 3 rail.

*proposed bauxite mining, if it goes ahead, would add massive environmental impacts to the region.

*Forecasted increase in tourism to YORK will make Gt Southern Highway even more dangerous.

14) Unacceptable risk to agriculture and food productivity:

In addition to rising risks to water quality and associated systems of the area, the landfill site would have an adverse impact on valuable agriculture of the region – wheat, organic olive oil, sheep, meat cattle, eggs. These would be at further risk from toxins carried in dust from the landfill site.

15) Avon National Park at risk?

Would the landfill affect the Avon National park? This needs to be carefully addressed. Risk of disruption to local ecosystems would be made higher.

16) Potential to harm Threatened and Endangered Species:

Establishment of the site would affect the native vegetation that is considered to provide habitat for protected fauna, namely Carnaby's Cockatoo. This is totally unacceptable.

17) Protection of rare species is paramount:

An extensive bird list for the area surrounding the proposed landfill site includes other rare species: Red-tailed Black Cockatoo, Baudin's Black Cockatoo, Western Yellow Robin, Black Shouldered Kite and Wedge - tailed Eagle. The disruption caused by the landfill would have an unacceptable impact on such species, especially at a time when their available habitats are fast being diminished elsewhere

18) Bushland also serves to control pests and diseases, important in agricultural areas. (*Australia State of the Environment 2011, P 680*).

Please consider this NO submission..

Thank you for attending to our concerns.

Meg and Paul Wilson

The Shire of York

P.O. Box 22

York. W.A. 6302

Attention: Manager of Planning Services

A Submission on the proposed landfill by SITA at lots 9926, 4869, 5931 and 26934 Great Southern Hwy St. Ronans, York.

As residents and ratepayers of York we object to this proposal for the following reasons.

Climate,

The applicant appears to have only taken into account the average annual rainfall. No consideration has been given to the flash flooding from summer storms which usually occurs once or twice a year.

Seismology,

The applicant agrees the proposed site is in a notable seismic activity area. However no earthquakes of a greater magnitude of 3.8 have been detected within 20km of the site. YET! What happens if or when it does?

Surface Water,

See "Climate"

Dust and Particulates,

The proposed site is 1.9 km from the nearest residence, but how far is it from arable land? A decent Willy-Willy would easily carry possibly toxic dust and particulate from dried leachate onto nearby cereal crops.

Leachate Dams,

The applicant states that the leachate dams must be large enough to contain two consecutive wet years (90th percentile) of rainfall generated leachate.

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SHIRE OF YORK	
FILE	PS-GEN-PP. 3-1
OFFICER	INITIALS
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25 MAY 2015	
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DATE	INITIALS

This is manifestly inadequate, due to the storm water from summer downpours onto the non hydroscopic soils and the landfill generated leachate.

Traffic,

The traffic assessment was undertaken using outdated data and does not include the impact of the Tier 3 Railway closure. In addition the applicant claims there would be 48 Road Train movements per day at 3 movements per hour. This would take a minimum of 16 hours, an impossibility for a 9 hour operating day! If the traffic impact was assessed using this data then it is a complete nonsense.

Future Expansion,

Once a noxious industry is allowed on one parcel of land there is little or no impediment to expansion, after all it's already contaminated.

Tourism,

The increase in Road Train traffic on the Great Southern Hwy will deter tourists from coming to York. As more and more people experience the sight of these behemoths appearing round a bend in the middle of the road or getting showered with gravel by one that's just slightly too far to the left, or worse.

The Allawanna proposal does not comply with clause 3.2.4 of the Shire of York Town Planning scheme No 2.

It does not retain or expand agricultural activity, it diminishes it.

It is a non-rural use that is monumentally detrimental to the environment.

It will have nothing but adverse effects on adjoining land and local amenities.

Glenn and Vicki Bertrand

Date

24/5/2015

STATE ADMINISTRATIVE TRIBUNAL ACT 2004

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Planning and Development (Development Assessment Panels) Regulations 2011

Matter Number: DR 127/2014

SITA Australia Pty Ltd (Applicant) and Wheatbelt Joint Development Assessment Panel
(Respondent)

SUBMISSION TO SHIRE OF YORK COUNCIL

James V Plumridge, PhD

YORK WA 6302

SHIRE OF YORK	
FILE	PS-GEN-PRO-3-1
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25 MAY 2015	
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REFERRED TO COUNCIL	
DATE	INITIALS

1. As a concerned resident of York, I oppose SITA's proposal, both in its original form and as recently revised, to develop a landfill at Allawuna.
2. I oppose it on numerous grounds. These include the safeguarding and improvement of York's heritage and local amenities, including traffic flow; security of our water supply; protection of local tourism and agriculture, and the welfare and continuing diversity of local wildlife. In this submission I shall deal with the following issues: threats to health and the environment, zoning, water security, abuse of corporate power, risk of earthquake, traffic problems and continuing community opposition to the proposal.

Contamination

3. Landfill is waste that cannot be recycled. Landfill sites are known to produce toxins and other contaminants, both water-borne and airborne. These have the potential to enter nearby properties and threaten the bio-security of farms.
4. SITA has said that it will deposit in the landfill only four kinds of waste, namely municipal (household) waste; commercial and industrial wastes;

construction and demolition waste; and sealed packets of asbestos, to be buried deep in the landfill.

5. Household waste from wheelie bins is not biologically or chemically inert. For example, it may contain pathogens from animal faeces, disposable nappies and discarded wound dressings like plasters and bandages, and rotting meat and other foodstuffs. It may also contain discarded batteries and other possible sources of chemical pollution like broken household appliances, household cleaner residue, computer and printer components and old mobile phones.
6. Environment Victoria estimated in 2009 that 234 million items of electronic waste would during that year find its way into landfill in Australia, a figure expected to rise to 700 million by 2020 in the absence of a national e-waste recycling program: see [http://www.tec.org.au/remos_downloads/Tipping Point 2009 Update.pdf](http://www.tec.org.au/remos_downloads/Tipping%20Point%202009%20Update.pdf) Unfortunately, not everything that should be is put aside for recycling.
7. Commercial, industrial, construction and demolition waste may include sharp objects, of glass, metal, plastic or wood, capable of puncturing the liner, especially if they are present in the first load of refuse dumped at the site. Construction and demolition waste—consisting mainly of concrete—generates dust that can be carried over considerable distances by the wind.
8. Asbestos is notoriously an extremely hazardous material. Does SITA intend to seal it in packets on site, or will it arrive at Allawuna already sealed? How and where will it be sealed, and how securely?
9. Landfill sites generate large quantities of leachate. This is a black, yellow or orange cloudy liquid produced by water passing through waste and collecting contaminant substances, either dissolved or in suspension, as it does so. Those substances include organic material of various kinds, including acids; metals, especially iron, zinc, and aluminium; heavy metals like lead, copper, mercury and nickel; polychlorinated biphenyls (PCBs); and dioxins. (See <http://en.wikipedia.org/wiki/Leachate>).

10. As landfill waste decomposes, it produces gases, notably methane, nitrogen and carbon dioxide, and substances like formaldehyde that are absorbed into leachate. Where building and construction wastes are present, as they would be at Allawuna, leachate may react with gypsum to produce hydrogen sulphide gas (colloquially known as Stink Damp), 'a colourless, flammable, poisonous gas that smells like rotten eggs. It is soluble in water and will corrode metals' (Australian Government Pollution Inventory, <http://www.npi.gov.au/resource/hydrogen-sulfide>).
11. Modern landfills attempt, not altogether successfully, to trap and contain leachate in ponds lined with plastic. The material currently used in the manufacture of landfill liners is a plastic called high-density polyethylene (HDPE). This is the kind of liner that SITA proposes to install at Allawuna.
12. According to SITA in a submission to DER (140106B 5.16.1 p.42), such liners have an estimated minimum lifespan of 20 years, the revised life of the landfill as proposed in SITA's latest submission to the SAT. It would still be possible for a liner to fail, i.e. leak, during that period, with disastrous consequences for local groundwater and nearby farms.
13. Liner failure may result from manufacturing defects, exposure to UV rays during manufacture or transportation, polymer breakdown, poor installation, tearing or ripping, and cracking from exposure to extreme heat. It appears that the HDPE liner to be used at the site is made of material 2mm thick. Because the clay soil covered by the liner is in an area fed by fresh water with low sodium content, it will crack as it dries, imposing a stress that may cause the liner to crack and fissure. On the other hand, if the liners become too wet, stitching may stretch and glued seams disintegrate.
14. In any case, due to manufacturing imperfections HDPE liners have a minimum inherent leakage rate of 10 litres per hour; in other words, leakage is technologically inevitable. SITA claims that it will take 178 years for leachate to travel 5 metres towards groundwater. Even if true, which is doubtful, that would merely postpone the problem of contamination to future generations of residents in the Shire of York.

15. Even if the liners were 100 mm thick, they would still allow chemicals and gases to pass through their membranes and would deteriorate over time, becoming brittle, swelling and breaking down (see www.zerowastelandfills.com).
16. Landfills attract birds, especially seagulls, which may drink from and swim in contaminated water such as leachate ponds. They also attract small animals, especially rodents, which like birds are no respecters of boundaries and would inevitably bring contaminants from landfill sites on to our farms.
17. SITA has claimed that fencing their leachate ponds will keep out kangaroos. Will it also keep out birds, or rats and other small mammals? How does SITA propose to deal with them?
18. One problem not so far addressed by SITA in its various reports is that posed by feral pigs, which are now fairly numerous on Allawuna and elsewhere in the district. Feral pigs are strong, intelligent and dangerous creatures. Being social animals, they can work cooperatively. They are attracted to any possible source of food and capable of breaking down or burrowing under fences to reach it. A fence designed to keep out kangaroos may not be sufficient to prevent feral pigs from gaining access to a landfill site and carrying contaminants into neighbouring farms.
19. If contaminants were to leak from the Allawuna landfill into groundwater, all farming practices in the area affected would have to cease, with calamitous consequences, financial and personal, for local farmers and their families.

Odours

20. Unpleasant odours, along with noise, litter and disturbance caused by heavy goods vehicles, appear to be a perennial problem for people living close to landfill sites.
21. In its recent project update, SITA claims, on the basis of 'detailed odour modelling', that 'odours will be contained wholly within the Farm boundaries'. Presumably the reference is to computer modelling, which in

other fields as disparate as climatology and global finance has proved at best uncertain in its predictions.

22. In Victoria, having previously fined the company, the Environmental Protection Agency in 2012 issued a 'Final Enforceable Undertaking' regarding offensive odours at SITA's Hallam Road site. (See <http://www.epa.vic.gov.au/our-work/current-issues/landfills/hallam-road-landfill>)
23. In the UK, problems of various kinds, including odour, have arisen in relation to SITA's landfill sites near Glenfarg and Peterhead in Scotland, at Path Head near Gateshead in the north of England and at Connon Bridge in Cornwall.

Agricultural Zoning

24. At present, farming in the York Shire enjoys the protection of zoning regulations set by the Shire Council. Those regulations reflect the importance of farming in the area to the local economy and by extension to the economy of WA.
25. Allawuna falls within the area designated by the Shire of York Town Planning Scheme No. 2 as the General Agriculture Zone. The objectives of this zoning may be summarized as:
 - (a) To ensure broad-acre farming continues as the principal land use in the district;
 - (b) To consider non-rural activities shown to be beneficial to the district and not detrimental to natural resources;
 - (c) To allow facilities for tourists, travellers and recreation uses; and
 - (d) To avoid adverse effects on agriculture of residential development in neighbouring zones.
26. The proposed establishment of a landfill at Allawuna is not consistent with those objectives. In particular, landfill activities pose the risk of serious detriment to natural resources—above all, water. The traffic problems they would generate, discussed below, will hamper tourism, cause inconvenience

to residents and increase the hazards of travel on the Great Southern Highway, York's main access road to the Great Eastern Highway and thence Perth.

27. Allawuna is prime agricultural land. This planning scheme classifies landfill as a 'noxious industry', a prohibited use on land zoned for agriculture. It follows that before SITA can go ahead with installing a landfill, the current zoning will have to be revised and amended. That would not be good news for local farmers, and would set an ugly precedent not only for the Wheatbelt but also for West Australian agriculture generally.
28. SITA is currently seeking approval to develop 52 hectares of Allawuna for landfill purposes, though it seems likely to us that in the future more land will be needed to keep up with waste management demands over the projected 40-year duration of the site. However, Allawuna has considerable reserves of kaolin (china clay). Kaolin is a valuable resource. It is used medicinally, e.g. in the treatment of digestive ailments and skin inflammation. It also has industrial uses, e.g. in the manufacture of toothpaste, cosmetics and soap.
29. It is possible that SITA will seek at some time in the future to increase its profits from the site by establishing a second industry, namely extraction of the clay, perhaps by leasing part of the farm to miners. In that case, SITA could argue that much of the infrastructure needed for such an enterprise already existed on site, thus making it easier for it to obtain planning and works approval for a second industry there.
30. SITA's application is also inconsistent with the objectives of York's Community Strategic Plan and Local Planning Strategy, which emphasize preserving and sustaining the natural environment and the protection of local agriculture by means of effective land use management. The Local Planning Strategy upholds, as an economic objective, the encouragement of tourism and the protection of broad-acre farming from the intrusion of urban and semi-urban uses.

31. It is hard to see how locating landfill at Allawuna will encourage tourists to visit York and investment in tourism, assist in preserving and sustaining the natural environment or fail to intrude on the interests of neighbouring farms.
32. Part 4 of Section 2.5 of the State Planning Policy aims to protect rural land from 'incompatible uses' and to ensure that land use provisions affecting rural land support 'existing and future primary production'. The Avon-Arc Sub-Regional Strategy has as key objectives not only recognition of agriculture as 'a significant land use and economic activity' but also 'the preservation of the cultural heritage of the region', of which farming, as well as being the mainstay of the local economy, is an important part.
33. Again, it is hard to see how the proposed landfill will contribute in any way to the achievement of those objectives. Landfill is a prime example of what should count as 'an incompatible use' in relation to farming.

Water

34. When groundwater is depleted, and too much is drawn from a water table before it has sufficiently recharged, 'cones of depression' may form, leading to the collapse of underground channels and caverns and producing sinkholes appearing as craters in the earth's surface.
35. Heavy pumping of groundwater depletes aquifers, leaving little or no water available to other users of the resource. In addition, it has catastrophic consequences for wildlife and native vegetation not only in the immediate vicinity but also further afield in nearby national parks.
36. SITA has said it will not be using groundwater but will rely on water from its storm-water dams. Unfortunately it may have no choice in the matter, other than the very costly and probably impracticable alternative of bringing water by truck to the site. It is likely to need more water than its dams can provide, for washing down roads and vehicles as well as for waste management purposes. The landfill site will have a constant population for six days per week, perhaps equivalent to a small residential sub-division,

requiring shower and sanitation facilities, placing further demands on a limited water supply. Is SITA willing to guarantee absolutely that it will not use groundwater under any circumstances whatsoever?

37. Although annual rainfall in the Allawuna area is barely sufficient to recharge aquifers and meet the needs of local farmers, weather can be volatile, with an increasing frequency of violent and unpredictable storms. During one such storm, on 29 January 2011, the area around Allawuna received 100 mm of rain in one hour. Dams broke their banks, creeks became rivers, fences were swept away and powerful winds scattered debris for kilometres.
38. A similar event—and climate change is increasing the probability of such events—would cause leachate dams at the landfill site to overflow, contaminating 13 Mile Brook, while strong winds would spread waste and pollutants widely over the landscape.
39. SITA may believe that it would be able to contain such an event, at any rate so far as groundwater contamination is concerned. However, it will not be able to detect with any degree of certainty the extent of contamination of underground aquifers in the wake of a severe storm. Bore monitoring for leakages would be inadequate to the task.
40. Liquid leaks into soil as a narrow plume of moisture and may travel a distance of 5 kilometres or more before the plume widens merely to between 20 and 30 metres. The bores used to detect leaks are usually 100 metres apart, so unless the plume heads directly towards a bore it may travel a very long way before being detected, and may not be detected at all.
41. According to the WA Department of Water, the aquifer system under York consists of fractured rock, mainly granite, containing pockets of water within the fractures. It is not easy to drill for water confined in this way. Nor is it easy to find out precisely where the water is, and it is more than likely that SITA's investigations, such as they have been, will have missed some pockets of water. If contaminants leak from the base of the landfill pit, the leak may penetrate the aquifer undetected; even if it is detected, it will be impossible

to remediate in the fractured rock or repair the leak under thousands of tons of rubbish.

42. The York district is renowned for its rocky outcrops. If SITA has to carry out blasting of large rock formations on the landfill site, this is certain to affect groundwater and the structure of underground waterways.
43. 13 Mile Brook is part of a complex network of waterways flowing into the Swan-Helena-Avon river catchment system and eventually into Mundaring Weir, which supplies potable water to the city, the Wheatbelt and the Goldfields. The WA Water Corporation has posted signs along the Allawuna boundary asking the public to report pollution of this important source of water. The area is subject to flash flooding following heavy rain.
44. As a matter of principle, indeed commonsense, landfills should be situated as far as possible from waterways, especially where those waterways are part of a catchment system providing drinking water to households. Potable water is too precious to be put at risk. It will become even more precious as population increases. SITA claims that reducing the landfill footprint and the volume of waste received will 'ensure a minimum 2 metre separation to the groundwater'. Even if true, that degree of separation may not be enough in the event, say, of serious earthquake activity.

Abuse of Corporate Power

45. Suez-Lyonnaise des Eaux (SLDE), the enormous multinational conglomerate of which SITA Australia is a subsidiary, was nominated in 2005 by the International Labor Rights Forum (ILRF) as one of the '14 worst corporate evildoers' in the world for its role in water privatization in poor countries. Its activities and failures to act resulted in outbreaks of cholera and gastro-enteritis in Manila that killed 6 people and made more than 700 others ill. In Bolivia, an SLDE subsidiary, Aquas de Illimani, 'left 200,000 without access to water and caused a revolt when it tried to charge \$335 to \$445 to connect a private home to water...in a country whose yearly per capita income is \$915'. (See <http://www.laborrights.org/creating-a-sweatfree-world/ethical-consumerism/news/114340>).

46. Such events illustrate the point that multinational companies like SITA are governed by the bottom line, not by concern for the welfare of ordinary people. They do whatever they can get away with in pursuit of their financial interests. Corporations like SITA have, in the words of an English judge, 'No souls to be saved, and no bottoms to be kicked'. If landfill contaminates our groundwater, it is farmers and householders, not SITA, who will suffer the worst of the consequences.
47. Such corporations have enormous financial power and political influence. They have a virtually infinite capacity to defend themselves from legal action brought against them by those they have injured. I would be surprised if SITA did not make donations to all of Western Australia's political parties; if it does, that would account for the failure of our local political representatives as well as the state opposition even to express an opinion on SITA's landfill proposal, let alone come out against it. Many of us strongly suspect that in the early days of the proposal attempts were made to 'buy off' councillors and officials of the Shire of York. We remember SITA's Niall Stock saying he was surprised the Shire was opposing the landfill proposal because he thought SITA and the Shire 'had a deal'. We know that certain Shire officials engaged in discussions with SITA about the proposed landfill long before the proposal became public knowledge. We have all become so inured to this kind of behind-the-scenes behaviour that we no longer see it for what it is.

Risk of Earthquake

48. York and surrounding areas are located in a recognized earthquake zone. Older buildings in and around York, including our house, show evidence of significant seismic damage over the years, especially from the Meckering earthquake of October 1968. That event registered 6.9 on the Richter scale, with surface faulting occurring over a range of 200 km². It was followed in March 1970 by a magnitude 6 quake at Calingiri. Tremors from the Meckering event were felt in Perth and as far away as Geraldton and Kalgoorlie.

49. According to UWA, the 'location of the faulting at Meckering and Calingiri...has shown that damaging earthquakes are a potential hazard in Western Australia and are not confined to the margins of the major lithospheric plates'
(http://www.seismicity.see.uwa.edu.au/welcome/seismicity_of_western_australia/wa_historical/meckering).
50. There is no guarantee that seismic events of a similar magnitude will not recur near York during the next 40 years, i.e. during the projected life of the proposed landfill site. Nor is there any guarantee that the technology proposed for the site, particularly in relation to the plastic liner, will be able to withstand such an event. In that case, toxic material could spill into waterways flowing into the Helena Valley and Mundaring catchment areas, rendering household water supplies unsafe and unfit to drink.
51. It makes sense to situate landfill sites as far away as possible from the likely epicentre of any future earthquake or other significant seismic activity. Allawuna is much too close.

Traffic

52. Residents of the Shire of York rely on the Great Southern and Great Eastern Highways for access to Perth. The Great Southern Highway runs from The Lakes off Great Eastern Highway to York, then to Brookton and on to Cranbrook in the Great Southern region. We rely on this means of access to the city for business purposes as well as for shopping, recreation and visiting family and friends.
53. In 2014 SITA published a 'fact sheet' headed 'Traffic Management' (http://www.sita.com.au/media/about_us/SITA_Draft-A4-Factsheets_WEB_TrafficManagement.pdf.) in an attempt to allay public misgivings about the effects of SITA trucks on the flow of traffic on Great Southern Highway (the Great Eastern Highway isn't mentioned). This publication refers to 'an independent traffic impact statement' which 'found the landfill would have a negligible impact on the local road network and the Great Southern Highway'.

54. It is hard to see how this can be so, even taking into account that, as SITA claims in its latest project update, 'the intersection of the site access road and the [Great Southern] Highway will be widened to Main Roads requirements'. SITA states that waste would be transported by road trains, 'with a maximum length of 27.5 metres', leaving Welshpool Transfer Station for Allawuna, and Allawuna for Welshpool, at 20 minute intervals at a rate of 3 per hour—as SITA puts it, 'just six extra traffic movements per hour'. This would happen 'during normal daytime business hours and on Saturday mornings'. The width of the road trains is not given. SITA has not disclosed if it has smaller trucks or other vehicles that will regularly make the same journey.
55. Road trains are not unknown on the Great Southern Highway, but it is doubtful that the road has ever seen so many so frequently each day at any time in its history. If 'normal business hours' means 8 hours Monday to Friday, and 4 on Saturday, that would mean 48 'extra traffic movements' per weekday and 24 on Saturdays, making a total of 264 such movements per week. How this can fail to inconvenience or pose some degree of hazard to other road users is difficult to understand.
56. The size of the road trains also needs to be considered. At 27.5 m (i.e. over 90 feet) long or less, these are presumably 'B-doubles', with a maximum width of 3.5 metres (about 11.5 feet) and maximum height of 4.6 metres (about 15 feet). It should be remembered that Great Southern Highway from The Lakes to Allawuna, a distance of almost 30 kilometres, consists of two lanes only, with several bends and few opportunities to overtake safely.
57. B-double road trains are not exactly behemoths, but with a more or less constant presence on a relatively narrow and occasionally winding road with one lane in each direction they could easily obstruct road visibility and hinder the smooth flow of other traffic. At 27.5 metres, each road train is a quarter of the length of a soccer field (110 metres) and one-third again the length of a cricket pitch (20.12 metres).

58. In an earlier publication, SITA said that it would be 'working with Main Roads WA to upgrade the intersection of the Great Southern Highway and Lakes Road' in order to 'ensure road trains can safely and smoothly access the Allawuna Farm Landfill site, without delay to other road users.' It will also construct 'a four metre wide, 110 metre long eastbound overtaking lane for road trains turning right into Allawuna Farm', and 'a 200 metre westbound, speed-up lane for road trains leaving the site'.
59. These projects are commendable, but take no account of the remaining distance between The Lakes and Allawuna. Do SITA and Main Roads intend to widen the road for nearly 30 kilometres—perhaps convert the road into a four-lane highway? This seems improbable, and may be impracticable, but in our opinion would be required to reduce the dangers arising from the presence of so many road trains on such a narrow road to a manageable level.

Community Opposition

60. Finally, we should consider the not insignificant fact that the York community simply doesn't want this landfill and sees it as a threat to its way of life. Vague promises of 'a significant boost to the [local] economy', of the provision of 20+ employment opportunities and the consequent flow of millions of dollars into the local economy seem to cut no ice with most residents. None of those promises is guaranteed so far as the people of York are concerned, and even if they were guaranteed, they would not be sufficient to change most people's minds.

People's feelings matter. York's history and heritage matter. The York community has been badly affected by the unwarranted suspension last year of its democratically elected Council. Many residents regard SITA's landfill proposal as the most serious threat to its existence that York has experienced for decades. It should not be allowed to succeed.